



**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER

ATTORNEY I.D. #56129

SUITE 5000 – MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106

(866) 413-2311

WWW.GOLDBECKLAW.COM

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES  
INC., ASSET-BACKED PASS-THROUGH  
CERTIFICATES, SERIES 2003-1A1

10801 6th Street

Suite 130

Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR.

VICKI L. HENRY

**Mortgagors and Real Owners**

419 Decatur Street

Philipsburg, PA 16866

*Defendants*

pd \$95.00 Atty  
**FILED** icc Atty  
m/10:55<sup>LM</sup>  
MAY 28 2008 acc shff

William A. Shaw <sup>LM</sup>  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term 2008-983-CD  
No.

**CIVIL ACTION: MORTGAGE  
FORECLOSURE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

Deputy Prothonotary

June 2, 2008

Document

Reinstated/Reissued to Sheriff/Attorney  
for service.

*Will*

Deputy Prothonotary

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

Reinstated/Reissued to Sheriff/Attorney  
for service. Document

A V I S O

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL

PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÓMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to **SAVE YOUR HOME FROM FORECLOSURE.**

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the FHFA website <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) at 800-211-6926 and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout/ Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 66779FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**This Action of Mortgage Foreclosure will continue unless you take action to stop it.**

## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1, 10801 6th Street, Suite 130, Rancho Cucamonga, CA 91730.
2. The names and addresses of the Defendants are RONALD D. HENRY JR., 200 Merryman Lane, Philipsburg, PA 16866 and VICKI L. HENRY, 200 Merryman Lane, Philipsburg, PA 16866, who are the mortgagors and real owners of the mortgaged premises hereinafter described.
3. On June 23, 2003 mortgagors made, executed and delivered a mortgage upon the Property hereinafter described to AMERIQUEST MORTGAGE COMPANY, which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200312190. The mortgage has been assigned to: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1 by assignment of Mortgage. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for December 01, 2007 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

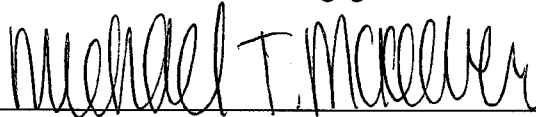
Principal Balance .....	\$106,423.93
Interest from 12/01/2007 through 05/31/2008 at 6.4000%.....	\$4,029.96
Per Diem interest rate at \$18.92	
Reasonable Attorney's Fee at 5% of Principal Balance	
as more fully explained in the next numbered paragraph .....	\$5,321.20
Late Charges from 12/01/2007 to 05/31/2008 .....	\$253.86
Monthly late charge amount at \$42.31	
Costs of suit and Title Search .....	\$900.00
Suspense .....	-\$247.93
Fees .....	\$30.50
Recoverable Balance.....	\$198.00
	<hr/>
	\$116,909.52

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees set forth above may be less than the amount demanded based on work actually performed. The Attorney's Fees requested are in conformity with the Mortgage and Pennsylvania law. Plaintiff is entitled to collect Attorney's fees of up to 5% of the remaining principal balance in the event the Property is sold to a third party purchaser at Sheriff's Sale or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.

8. Plaintiff is not seeking a judgment of personal liability (or an "in personam" judgment) against the Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendants by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendants have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendants through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands a de terris judgment in mortgage foreclosure in the sum of \$116,909.52, together with interest at the rate of \$18.92, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By:



**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. MCKEEVER, ESQUIRE

ATTORNEY FOR PLAINTIFF

**VERIFICATION**

I, Ralph Lopez, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 5-19-08

Ralph Lopez  
Ralph Lopez  
CITI RESIDENTIAL LENDING, INC.

0048828768 RONALD D. HENRY JR. and VICKI L. HENRY

# *Exhibit A*

ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street; thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150') to Ida Street; thence by said Street North twenty-seven degrees fifteen minutes West, ninety feet (90'); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150') to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110') to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Fourt (4) in Foster's Addition to the Borough of Chester Hill.

UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations; conditions and restrictions as contained in prior Deeds in the chain of title.

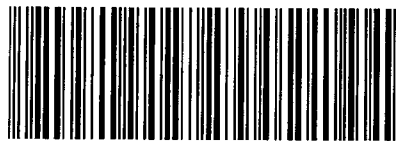
As described in Deed Book 1876, Page 360

Parcel #3-P12-335-43



# *Exhibit B*

P.O. Box 11000  
Santa Ana, CA 92711-1000



7182 6389 3060 1209 3312

Citi Residential Lending



March 28, 2008

RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

1 / NMC

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

**THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.**

**This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.**

**The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.**

**To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.**

**The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).**

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

**LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO**

Citi Residential Lending  
P.O.Box 11000  
Santa Ana, CA 92711-1000



March 28, 2008

#BWNKZZS  
RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

109 / NMR

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN

PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE  
WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND  
HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

**TEMPORARY STAY OF FORECLOSURE** --Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT" EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

**CONSUMER CREDIT COUNSELING AGENCIES** --If you meet with one of the consumer credit counseling agency listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face- to-face meeting. Advise your lender immediately of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE** --Your mortgage is in a default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

**AGENCY ACTION** -- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

March 28, 2008

Loan Number: 0048828768

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

**(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)**

**HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).**

**NATURE OF THE DEFAULT** -The MORTGAGE debt by the above lender on your property located at: 419 DECATUR STREET, PHILIPSBURG, PA 16866 IS SERIOUSLY IN DEFAULT because:

**A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS** for the following months and the following amounts are now past due:

12/01/07 thru 03/01/08

Minimum Payments plus late charge or other fees: \$3048.88

**Minimum Amount to Cure Default: \$3048.88**

**B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable):** N/A

**HOW TO CURE THE DEFAULT** --You may cure the default within THIRTY (30) DAYS of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$3048.88 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:**

Citi Residential Lending  
P.O. Box 5926  
Carol Stream, IL 60197-5926

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: **(Do not use if not applicable.)** N/A

**IF YOU DO NOT CURE THE DEFAULT** --If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, **the lender intends to exercise its rights to accelerate the mortgage debt.** This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to **foreclose upon your mortgaged property.**

**IF THE MORTGAGE IS FORECLOSED UPON**-- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. **If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.**

**OTHER LENDER REMEDIES** -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE**-- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, **you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the minimum amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage.** Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

**EARLIEST POSSIBLE SHERIFF'S SALE DATE**-- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Citi Residential Lending  
PO Box 11000  
Santa Ana, CA 92711-1000  
Phone Number 800-430-5262  
Fax Number 714-347-5037

**EFFECT OF SHERIFF'S SALE** -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

**ASSUMPTION OF MORTGAGE** -- You      may or  X  may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**YOU MAY ALSO HAVE THE RIGHT:**

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE ATTACHED**

If you need additional assistance or counseling you may also find a Housing Counseling Agency in your area by calling Toll-free (800) 569-4287 or TDD (800) 877-8339.

Citi Residential Lending

Cc: Citi Residential Lending  
Attn: Collections Department

Loan Number: 0048828768  
Mailed by 1st Class Mail and by Certified Mail

## Homeowner s Emergency Assistance Program Centre County

---

**CCCS of Northeastern PA**

---

201 Basin Street  
Suite 6  
Williamsport, PA 17701  
570.323.6627  
800.922.9537

---

**CCCS of Northeastern PA**

---

202 W. Hamilton Avenue  
State College, PA 16801  
814.238.3668  
800.922.9537

---

**CCCS of Western PA**

---

Royal Remax Plaza  
917 A Logan Boulevard  
Altoona, PA 16602  
888.511.2227

---

**Lycom.Clnta Co Comm fo Comm Action**

---

2138 Lincoln Street  
P.O. Box 3568  
Williamsport, PA 17703  
570.326.0587

**GOLDBECK McCAFFERTY &  
McKEEVER**

By: MICHAEL T. MCKEEVER  
ATTORNEY I.D. #56129  
SUITE 5000 – MELLON INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532  
(215) 627-1322  
ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-BACKED  
PASS-THROUGH CERTIFICATES, SERIES 2003-  
IA1

10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE  
FORECLOSURE

Term  
No. 2008-983-CD

**FILED**

JUN 02 2008

m/11:15/12

William A. Shaw  
Prothonotary/Clerk of Courts

CERT TO

ATTY W/


REINSTATED COMPL:

2 REINSTATED  
TO SHAW

PRAECIPE TO REINSTATE COMPLAINT

Kindly reinstate the Complaint in the above captioned matter.

By:



GOLDBECK McCAFFERTY & McKEEVER  
MICHAEL T. MCKEEVER, ESQUIRE  
ATTORNEY FOR PLAINTIFF



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-983-CD

DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee

vs

SERVICE # 1 OF 2

RONALD D. HENRY JR. and VICKI L. HENRY

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 06/27/2008

HEARING:

PAGE: 104220

**FILED**

0 3:29 PM '08

JUN 05 2008

NO CC

William A. Shaw  
Prothonotary/Clerk of Courts

DEFENDANT: RONALD D. HENRY JR.

ADDRESS: 419 DECATUR ST.  
PHILIPSBURG, PA 16866

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

*House Empty*

**SHERIFF'S RETURN**

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **SERVED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON RONALD D. HENRY JR., DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED \_\_\_\_\_

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM **POSTED** THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR RONALD D. HENRY JR.

AT (ADDRESS) \_\_\_\_\_

NOW 6/5/08 AT 9am AM PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF **NOT FOUND** AS TO RONALD D. HENRY JR.

REASON UNABLE TO LOCATE

*House Empty*

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

*[Signature]*  
Deputy Signature

*S. Hunter*  
Print Deputy Name

**SHERIFF'S OFFICE  
CLEARFIELD COUNTY  
CASE # 104220**

DEAR RONALD D. HENRY JR.

Would you please contact the Sheriff's Office EXTENSION **1360** concerning legal papers we have for you

When you call, please give your name and the case # noted above (**104220**) and someone in the Office will be able to help you.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.  
PHONE (814) 765-2641

# **GOLDBECK McCAFFERTY & McKEEVER**

**BY: MICHAEL T. MCKEEVER**

**ATTORNEY I.D. #56129**

**SUITE 5000 – MELLON INDEPENDENCE CENTER**

**701 MARKET STREET**

**PHILADELPHIA, PA 19106**

**(866) 413-2311**

**WWW.GOLDBECKLAW.COM**

**ATTORNEY FOR PLAINTIFF**

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES  
INC., ASSET-BACKED PASS-THROUGH  
CERTIFICATES, SERIES 2003-1A1**

**10801 6th Street**

**Suite 130**

**Rancho Cucamonga, CA 91730**

*Plaintiff*

**vs.**

**RONALD D. HENRY JR.**

**VICKI L. HENRY**

**Mortgagors and Real Owners**

**419 Decatur Street**

**Philipsburg, PA 16866**

*Defendants*

**I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED**

**IN THE COURT OF COMMON PLEAS**

**OF CLEARFIELD COUNTY**

**CIVIL ACTION - LAW**

**ACTION OF MORTGAGE FORECLOSURE**

Term **2008-983-CD**  
No.

**CIVIL ACTION: MORTGAGE  
FORECLOSURE**

## **NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

### **KEYSTONE LEGAL SERVICES**

**211 1/2 E. Locust Street**

**Clearfield, PA 16830**

**814-765-9646**

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

**MAY 28 2008**

### **PENNSYLVANIA BAR ASSOCIATION**

**P.O. Box 186**

**Harrisburg, PA 17108**

**800-692-7375**

**Attest.**

*William A. Brown*  
Prothonotary/  
Clerk of Courts

## **AVISO**

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL

PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COURTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÓMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT  
A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU  
WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to **SAVE YOUR HOME FROM FORECLOSURE.**

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) at 800-211-6926 and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout / Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 66779FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**This Action of Mortgage Foreclosure will continue unless you take action to stop it.**

## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1, 10801 6th Street, Suite 130, Rancho Cucamonga, CA 91730. **THE ORIGINAL FILED**
2. The names and addresses of the Defendants are RONALD D. HENRY JR., 200 Merryman Lane, Philipsburg, PA 16866 and VICKI L. HENRY, 200 Merryman Lane, Philipsburg, PA 16866, who are the mortgagors and real owners of the mortgaged premises hereinafter described.
3. On June 23, 2003 mortgagors made, executed and delivered a mortgage upon the Property hereinafter described to AMERIQUEST MORTGAGE COMPANY, which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200312190. The mortgage has been assigned to: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 by assignment of Mortgage. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for December 01, 2007 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

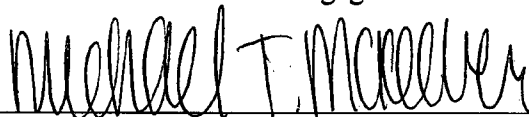
Principal Balance .....	\$106,423.93
Interest from 12/01/2007 through 05/31/2008 at 6.4000%.....	\$4,029.96
Per Diem interest rate at \$18.92	
Reasonable Attorney's Fee at 5% of Principal Balance	
as more fully explained in the next numbered paragraph .....	\$5,321.20
Late Charges from 12/01/2007 to 05/31/2008 .....	\$253.86
Monthly late charge amount at \$42.31	
Costs of suit and Title Search .....	\$900.00
Suspense.....	-\$247.93
Fees .....	\$30.50
Recoverable Balance.....	\$198.00
	<u>\$116,909.52</u>

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees set forth above may be less than the amount demanded based on work actually performed. The Attorney's Fees requested are in conformity with the Mortgage and Pennsylvania law. Plaintiff is entitled to collect Attorney's fees of up to 5% of the remaining principal balance in the event the Property is sold to a third party purchaser at Sheriff's Sale or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.

8. Plaintiff is not seeking a judgment of personal liability (or an "in personam" judgment) against the Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendants by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendants have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendants through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands a de teris judgment in mortgage foreclosure in the sum of \$116,909.52, together with interest at the rate of \$18.92, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By: \_\_\_\_\_



**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER, ESQUIRE

ATTORNEY FOR PLAINTIFF

**VERIFICATION**

I, Ralph Lopez, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 5-19-08

Ralph Lopez  
Ralph Lopez  
CITI RESIDENTIAL LENDING, INC.

0048828768 RONALD D. HENRY JR. and VICKI L. HENRY

# *Exhibit A*



ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street; thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150') to Ida Street; thence by said Street North twenty-seven degrees fifteen minutes West, ninety feet (90'); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150') to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110') to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Fourt (4) in Foster's Addition to the Borough of Chester Hill.

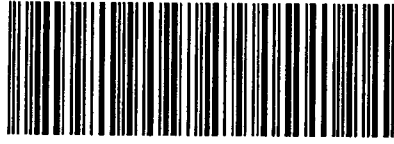
UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

As described in Deed Book 1876, Page 360

Parcel #3-P12-335-43

# *Exhibit B*

P.O. Box 11000  
Santa Ana, CA 92711-1000



7182 6389 3060 1209 3312

Citi Residential Lending



March 28, 2008

RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

1 / NMC

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para informacion en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

**THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.**

**This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.**

**The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.**

**To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.**

**The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).**

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO

Citi Residential Lending  
P.O.Box 11000  
Santa Ana, CA 92711-1000



#BWNKZZS  
RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

March 28, 2008

109 / NMR

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN

PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE  
WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND  
HELP YOU MAKE FUTURE MORTGAGE PAYMENTS

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE --Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this Notice. THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT" EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

CONSUMER CREDIT COUNSELING AGENCIES --If you meet with one of the consumer credit counseling agency listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face- to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE --Your mortgage is in a default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

AGENCY ACTION -- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

March 28, 2008

Loan Number: 0048828768

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

**(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)**

**HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).**

**NATURE OF THE DEFAULT** - The MORTGAGE debt by the above lender on your property located at: 419 DECATUR STREET, PHILIPSBURG, PA 16866 IS SERIOUSLY IN DEFAULT because:

**A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS** for the following months and the following amounts are now past due:

12/01/07 thru 03/01/08

Minimum Payments plus late charge or other fees: \$3048.88

**Minimum Amount to Cure Default: \$3048.88**

**B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION** (Do not use if not applicable): N/A

**HOW TO CURE THE DEFAULT** -- You may cure the default within THIRTY (30) DAYS of the date of this notice **BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$3048.88 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:**

Citi Residential Lending  
P.O. Box 5926  
Carol Stream, IL 60197-5926

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.) N/A

**IF YOU DO NOT CURE THE DEFAULT** -- If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.

**IF THE MORTGAGE IS FORECLOSED UPON** -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

**OTHER LENDER REMEDIES** -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE** -- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the minimum amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

**EARLIEST POSSIBLE SHERIFF'S SALE DATE**-- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Citi Residential Lending  
PO Box 11000  
Santa Ana, CA 92711-1000  
Phone Number 800-430-5262  
Fax Number 714-347-5037

**EFFECT OF SHERIFF'S SALE** -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

**ASSUMPTION OF MORTGAGE** -- You      may or X may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**YOU MAY ALSO HAVE THE RIGHT:**

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE ATTACHED**

If you need additional assistance or counseling you may also find a Housing Counseling Agency in your area by calling Toll-free (800) 569-4287 or TDD (800) 877-8339.

Citi Residential Lending

Cc: Citi Residential Lending  
Attn: Collections Department

Loan Number: 0048828768  
Mailed by 1st Class Mail and by Certified Mail

## Homeowner s Emergency Assistance Program Centre County

---

---

---

**CCCS of Northeastern PA**

201 Basin Street  
Suite 6  
Williamsport, PA 17701  
570.323.6627  
800.922.9537

---

**CCCS of Northeastern PA**

202 W. Hamilton Avenue  
State College, PA 16801  
814.238.3668  
800.922.9537

**CCCS of Western PA**

Royal Remax Plaza  
917 A Logan Boulevard  
Altoona, PA 16602  
888.511.2227

**Lycorn, Clinton Co Comm fo Comm Action**

2138 Lincoln Street  
P.O. Box 3568  
Williamsport, PA 17703  
570.326.0587



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

NO: 08-983-CD

DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee

vs

SERVICE # 2 OF 2

RONALD D. HENRY JR. and VICKI L. HENRY

COMPLAINT IN MORTGAGE FORECLOSURE

SERVE BY: 06/27/2008

HEARING:

PAGE: 104220

DEFENDANT:

VICKY L. HENRY

ADDRESS:

419 DECATUR ST.

PHILIPSBURG, PA 16866

ALTERNATE ADDRESS

SERVE AND LEAVE WITH: DEFENDANT/AAR

FILED

03:29 PM '08

JUN 05 2008

William A. Shaw  
Prothonotary/Clerk of Courts

CIRCLE IF THIS HIGHLIGHTED ADDRESS IS:

VACANT

OCCUPIED

ATTEMPTS

House Empty

SHERIFF'S RETURN

NOW, \_\_\_\_\_ AT \_\_\_\_\_ AM / PM SERVED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE ON VICKY L. HENRY, DEFENDANT

BY HANDING TO \_\_\_\_\_ / \_\_\_\_\_

A TRUE AND ATTESTED COPY OF THE ORIGINAL DOCUMENT AND MADE KNOW TO HIM / HER THE CONTENTS THEREOF.

ADDRESS SERVED \_\_\_\_\_

NOW \_\_\_\_\_ AT \_\_\_\_\_ AM / PM POSTED THE WITHIN

COMPLAINT IN MORTGAGE FORECLOSURE FOR VICKY L. HENRY

AT (ADDRESS) \_\_\_\_\_

NOW 6/5/08 AT 9 AM AM / PM AFTER DILIGENT SEARCH IN MY BAILIWICK,

I MAKE RETURN OF NOT FOUND AS TO VICKY L. HENRY

REASON UNABLE TO LOCATE House Empty

SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_ 2008

So Answers: CHESTER A. HAWKINS, SHERIFF

BY:

Deputy S. Hunter

Deputy Signature

S. Hunter

Print Deputy Name

**SHERIFF'S OFFICE  
CLEARFIELD COUNTY  
CASE # 104220**

DEAR VICKY L. HENRY

Would you please contact the Sheriff's Office EXTENSION **1360** concerning legal papers we have for you

When you call, please give your name and the case # noted above (**104220**) and someone in the Office will be able to help you.

Thank you for your consideration in this matter.

SHERIFF CHESTER A. HAWKINS

OFFICE HOURS: 8:30 A.M. to 4:00 P.M.  
PHONE (814) 765-2641

**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER

ATTORNEY I.D. #56129

SUITE 5000 – MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106

(866) 413-2311

WWW.GOLDBECKLAW.COM

ATTORNEY FOR PLAINTIFF

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES  
INC., ASSET-BACKED PASS-THROUGH  
CERTIFICATES, SERIES 2003-1A1

10801 6th Street

Suite 130

Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR.

VICKI L. HENRY

Mortgagors and Real Owners

419 Decatur Street

Philipsburg, PA 16866

*Defendants*

**I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED**

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term *2008-983-CD*  
No.

**CIVIL ACTION: MORTGAGE  
FORECLOSURE**

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

**MAY 28 2008**

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

Attest.

*William A. Brown*  
Prothonotary/  
Clerk of Courts

**AVISO**

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL

PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÓMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Resources available for Homeowners in Foreclosure

**ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) at 800-211-6926 and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout/ Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 66779FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**This Action of Mortgage Foreclosure will continue unless you take action to stop it.**

## COMPLAINT IN MORTGAGE FORECLOSURE

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1, 10800 Little Street, Suite 130, Rancho Cucamonga, CA 91730. **HEREBY CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF THE ORIGINAL FILED**
2. The names and addresses of the Defendants are RONALD D. HENRY JR., 200 Merryman Lane, Philipsburg, PA 16866 and VICKI L. HENRY, 200 Merryman Lane, Philipsburg, PA 16866, who are the mortgagors and real owners of the mortgage premises hereinafter described.
3. On June 23, 2003 mortgagors made, executed and delivered a mortgage upon the Property hereinafter described to AMERIQUEST MORTGAGE COMPANY, which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200312190. The mortgage has been assigned to: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 by assignment of Mortgage. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for December 01, 2007 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

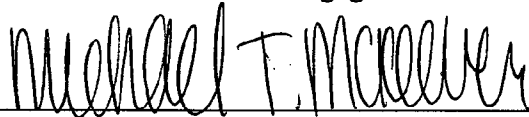
Principal Balance .....	\$106,423.93
Interest from 12/01/2007 through 05/31/2008 at 6.4000%.....	\$4,029.96
Per Diem interest rate at \$18.92	
Reasonable Attorney's Fee at 5% of Principal Balance	
as more fully explained in the next numbered paragraph .....	\$5,321.20
Late Charges from 12/01/2007 to 05/31/2008 .....	\$253.86
Monthly late charge amount at \$42.31	
Costs of suit and Title Search .....	\$900.00
Suspense.....	-\$247.93
Fees .....	\$30.50
Recoverable Balance.....	\$198.00
	<u>\$116,909.52</u>

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees set forth above may be less than the amount demanded based on work actually performed. The Attorney's Fees requested are in conformity with the Mortgage and Pennsylvania law. Plaintiff is entitled to collect Attorney's fees of up to 5% of the remaining principal balance in the event the Property is sold to a third party purchaser at Sheriff's Sale or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.

8. Plaintiff is not seeking a judgment of personal liability (or an "in personam" judgment) against the Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendants by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendants have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendants through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands a de teris judgment in mortgage foreclosure in the sum of \$116,909.52, together with interest at the rate of \$18.92, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By: \_\_\_\_\_



**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER, ESQUIRE

ATTORNEY FOR PLAINTIFF

**VERIFICATION**

I, Ralph Lopez, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 5-19-08

Ralph Lopez  
Ralph Lopez  
CITI RESIDENTIAL LENDING, INC.

0048828768 RONALD D. HENRY JR. and VICKI L. HENRY

# *Exhibit A*



ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street; thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150') to Ida Street; thence by said Street North twenty-seven degrees fifteen minutes West, ninety feet (90'); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150') to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110') to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Fourt (4) In Foster's Addition to the Borough of Chester Hill.

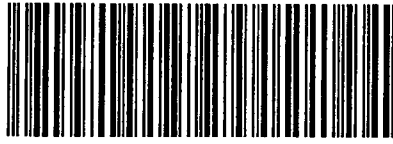
UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

As described in Deed Book 1876, Page 360

Parcel #3-P12-335-43

# *Exhibit B*

P.O. Box 11000  
Santa Ana, CA 92711-1000



7182 6389 3060 1209 3312

Citi Residential Lending



March 28, 2008

RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

1 / SMC

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

**THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.**

**This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.**

**The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.**

**To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.**

**The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).**

**This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.**

**LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO**

Citi Residential Lending  
P.O.Box 11000  
Santa Ana, CA 92711-1000



March 28, 2008

#BWNKZZS  
RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

169 / NMR

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN

PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

**HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM**

**YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE  
WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND  
HELP YOU MAKE FUTURE MORTGAGE PAYMENTS**

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

**TEMPORARY STAY OF FORECLOSURE** --Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this Notice. **THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT" EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.**

**CONSUMER CREDIT COUNSELING AGENCIES** --If you meet with one of the consumer credit counseling agency listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face- to-face meeting. Advise your lender immediately of your intentions.

**APPLICATION FOR MORTGAGE ASSISTANCE** --Your mortgage is in a default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

**AGENCY ACTION** --Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

March 28, 2008

Loan Number: 0048828768

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

**(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)**

**HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).**

**NATURE OF THE DEFAULT** - The MORTGAGE debt by the above lender on your property located at: 419 DECATUR STREET, PHILIPSBURG, PA 16866 IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:

12/01/07 thru 03/01/08

Minimum Payments plus late charge or other fees: \$3048.88

**Minimum Amount to Cure Default: \$3048.88**

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): N/A

**HOW TO CURE THE DEFAULT** -- You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$3048.88 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

Citi Residential Lending  
P.O. Box 5926  
Carol Stream, IL 60197-5926

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.) N/A

**IF YOU DO NOT CURE THE DEFAULT** -- If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.

**IF THE MORTGAGE IS FORECLOSED UPON** -- The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

**OTHER LENDER REMEDIES** -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE** -- If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the minimum amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

**EARLIEST POSSIBLE SHERIFF'S SALE DATE**-- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Citi Residential Lending  
PO Box 11000  
Santa Ana, CA 92711-1000  
Phone Number 800-430-5262  
Fax Number 714-347-5037

**EFFECT OF SHERIFF'S SALE** -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

**ASSUMPTION OF MORTGAGE** -- You      may or  X  may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**YOU MAY ALSO HAVE THE RIGHT:**

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS,
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE ATTACHED**

If you need additional assistance or counseling you may also find a Housing Counseling Agency in your area by calling Toll-free (800) 569-4287 or TDD (800) 877-8339.

Citi Residential Lending

Cc: Citi Residential Lending  
Attn: Collections Department

Loan Number: 0048828768  
Mailed by 1st Class Mail and by Certified Mail

## Homeowner s Emergency Assistance Program Centre County

---

---

---

**CCCS of Northeastern PA**

201 Basin Street  
Suite 6  
Williamsport, PA 17701  
570.323.6627  
800.922.9537

**CCCS of Northeastern PA**

---

202 W. Hamilton Avenue  
State College, PA 16801  
814.238.3668  
800.922.9537

**CCCS of Western PA**

Royal Remax Plaza  
917 A Logan Boulevard  
Altoona, PA 16602  
888.511.2227

**Lycem. Clntr Co Comm fo Comm Action**

2138 Lincoln Street  
P.O. Box 3568  
Williamsport, PA 17703  
570.326.0587



CA

IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR. and VICKI L. HENRY  
**Mortgagor(s) and Record Owner(s)**

419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

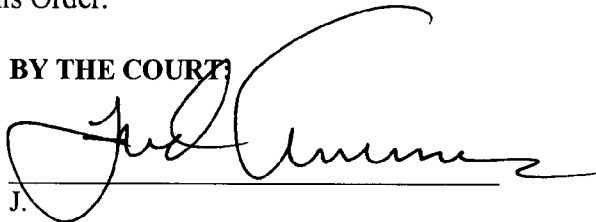
Term, No. 2008-983-CD

**ORDER**

And now, on this 26 day of August, 2008, upon  
consideration of the Motion to Compel Sheriff to Process Return of Service of plaintiff,  
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 ("Plaintiff"), and any  
response thereto, it is hereby

**ORDERED and DECREED** that the Sheriff of Clearfield County shall ~~(i) file the return~~  
~~of service with the Prothonotary, and~~ (ii) send a copy of the return of service to Plaintiff's  
counsel within five (5) days of the date of this Order.

BY THE COURT

  
J.

FILED  
9/4/08  
AUG 26 2008

William A. Shaw  
Prothonotary/Clerk of Courts  
2 cc Atty Fein

1 cc Sheriff (without memo)

FILED

AUG 26 2008

William A. Shaw  
Prothonotary/Clerk of Courts

DATE: 8/26/08

☒ You are responsible for serving all appropriate parties.

\_\_\_ The Prothonotary's office has provided service to the following parties:

\_\_\_ Plaintiff(s) \_\_\_ Plaintiff(s) Attorney \_\_\_ Other

\_\_\_ Defendant(s) \_\_\_ Defendant(s) Attorney

\_\_\_ Special Instructions:

**GOLDBECK McCafferty & McKEEVER**

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE  
SECURITIES INC., ASSET-BACKED PASS-  
THROUGH CERTIFICATES, SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR. and VICKI L. HENRY  
**Mortgagor(s) and Record Owner(s)**

419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

Term, No. 2008-983-CD

**MOTION TO COMPEL SHERIFF TO PROCESS RETURN OF SERVICE**

Plaintiff, DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 ("Plaintiff"), by and through its attorneys, Goldbeck McCafferty & McKeever, moves this Honorable Court for an Order to Compel the Sheriff of Clearfield County to process the return of service:

1. On May 28, 2008 Plaintiff filed its Complaint in Mortgage Foreclosure.
2. On that same day, Plaintiff requested that the Sheriff of Clearfield County serve the complaint upon defendants, RONALD D. HENRY JR. and VICKI L. HENRY ("Defendants")

**FILED**  
m 12:28 p.m. GK  
AUG 21 2008 *ILL Amy*  
William A. Shaw  
Prothonotary/Clerk of Courts

3. To the best of Plaintiff's knowledge, the Sheriff attempted service of the complaint.

4. Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added).

5. Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made.

6. It has been two (2) months, yet the Sheriff has neither filed the return of service with the Prothonotary, nor mailed the return of service to Plaintiff.

7. The Sheriff is not in compliance with Rule 405.

8. The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order compelling the Sheriff to process the return of service.

Respectfully submitted,

**GOLDBECK McCAFFERTY & McKEEVER**

A handwritten signature in black ink, appearing to read 'David Fein', is written over a horizontal line.

David Fein, Esquire  
Attorney for Plaintiff

**GOLDBECK McCAFFERTY & McKEEVER**

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE  
SECURITIES INC., ASSET-BACKED PASS-  
THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730  
*Plaintiff*

vs.

RONALD D. HENRY JR. and VICKI L. HENRY  
**Mortgagor(s) and Record Owner(s)**

419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

Term, No. 2008-983-CD

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF ITS  
MOTION TO COMPEL SHERIFF TO PROCESS RETURN OF SERVICE**

**I. FACTS**

On May 28, 2008, Plaintiff filed its Complaint in Mortgage Foreclosure. On that same day, Plaintiff requested that the Sheriff of Clearfield County serve the complaint upon Defendants. To the best of Plaintiff's knowledge, the Sheriff attempted service of the complaint.

**II. ARGUMENT**

Pursuant to Pa. R.C.P. No. 405(a), after service is attempted, the Sheriff shall make a return of service or a return of no service forthwith. (emphasis added). Pursuant to Rule 405(e), the return of service or of no service shall be filed with the Prothonotary and mailed to the person requesting service to be made. It has been two (2) months, yet the Sheriff has neither filed the

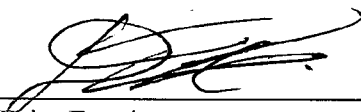
return of service with the Prothonotary, nor mailed the return of service to Plaintiff. The Sheriff is not in compliance with Rule 405.

**III. CONCLUSION**

The Sheriff's delay has caused prejudice to Plaintiff, as Plaintiff has been unable to continue with this lawsuit. Plaintiff therefore requests that this Honorable Court enter an Order compelling the Sheriff to process the return of service.

Respectfully submitted,

**GOLDBECK McCAFFERTY & McKEEVER**



---

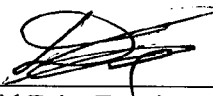
David Fein, Esquire  
Attorney for Plaintiff

**VERIFICATION**

David Fein, Esquire, hereby states that he is the attorney for Plaintiff herein, and that all of the facts set forth within the attached Motion are true and correct to the best of his knowledge, information and belief. The undersigned understands that the foregoing statements are made subject to the penalties of 18 P.S. Section 4904.

**GOLDBECK McCAFFERTY & McKEEVER**

By:

  
\_\_\_\_\_  
David Fein, Esquire  
Attorney for Plaintiff

**GOLDBECK McCafferty & McKeever**

BY: DAVID FEIN, ESQUIRE

Attorney I.D. #82628

Suite 5000 – Mellon Independence Center

701 Market Street

Philadelphia, PA 19106

215-627-1322

**ATTORNEY FOR PLAINTIFF**

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-BACKED  
PASS-THROUGH CERTIFICATES, SERIES 2003-  
IA1

10801 6th Street

Suite 130

Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR. and VICKI L. HENRY

**Mortgagor(s) and Record Owner(s)**

419 Decatur Street

Philipsburg, PA 16866

*Defendant(s)*

IN THE COURT OF COMMON PLEAS

OF Clearfield COUNTY

TERM, No. 2008-983-CD

**CERTIFICATE OF SERVICE**

David Fein, Esquire, hereby certifies that on August 19, 2008 he did serve true and correct copies of the within Motion by first class mail, postage pre-paid upon the following:

RONALD D. HENRY JR.

VICKI L. HENRY

200 Merryman Lane

Philipsburg, PA 16866

RONALD D. HENRY JR

VICKI L. HENRY

419 Decatur Street

Philipsburg, PA 16866



\_\_\_\_\_  
David Fein, Esquire  
Attorney for Plaintiff

Date: August 19, 2008



**FILED**

**AUG 21 2009**

**William A. Shaw**  
**Prothonotary/Clerk of Courts**

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

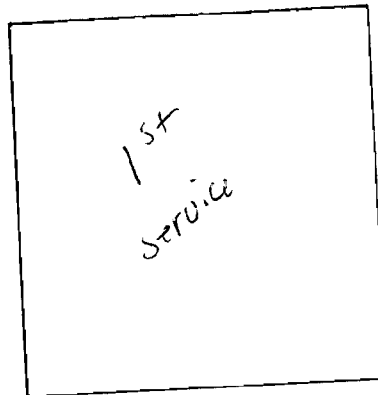
DOCKET # 104220  
NO: 08-983-CD  
SERVICES 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, as Trustee  
vs.  
DEFENDANT: RONALD D. HENRY JR. and VICKI L. HENRY

SHERIFF RETURN

RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	339219	20.00
SHERIFF HAWKINS	GOLDBECK	339219	35.16



FILED  
01:05:56 PM  
AUG 28 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,

A handwritten signature in cursive, appearing to read "Chester A. Hawkins".

Chester A. Hawkins  
Sheriff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104234  
NO: 08-983-CD  
SERVICE # 1 OF 2  
COMPLAINT IN MORTGAGE FORECLOSURE

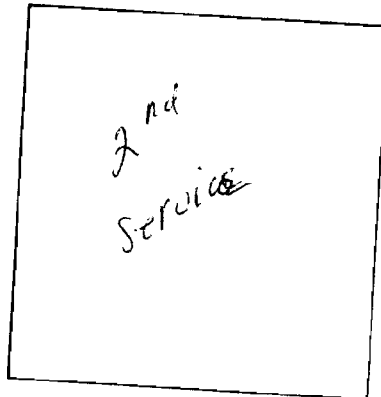
PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
vs.  
DEFENDANT: RONALD D. HENRY JR. and VICKI L. HENRY

SHERIFF RETURN

---

NOW, June 03, 2008, SHERIFF OF CENTRE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONALD D. HENRY J.R.

NOW, June 12, 2008 AT 3:00 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON RONALD D. HENRY J.R, DEFENDANT. THE RETURN OF CENTRE COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.



FILED  
10:56 AM  
AUG 28 2008  
William A. Shaw  
Prothonotary/Clerk of Courts

**IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA**

DOCKET # 104234  
NO: 08-983-CD  
SERVICE # 2 OF 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
vs.  
DEFENDANT: RONALD D. HENRY JR. and VICKI L. HENRY

**SHERIFF RETURN**

---

NOW, June 03, 2008, SHERIFF OF CENTRE COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VICKI L. HENRY.

NOW, June 12, 2008 AT 3:00 PM SERVED THE WITHIN COMPLAINT IN MORTGAGE FORECLOSURE ON VICKI L. HENRY, DEFENDANT. THE RETURN OF CENTRE COUNTY IS HERETO ATTACHED AND MADE PART OF THIS RETURN.

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 104234  
NO: 08-983-CD  
SERVICES 2  
COMPLAINT IN MORTGAGE FORECLOSURE

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee  
vs.  
DEFENDANT: RONALD D. HENRY JR. and VICKI L. HENRY

SHERIFF RETURN

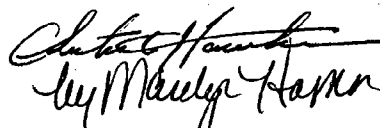
RETURN COSTS

Description	Paid By	CHECK #	AMOUNT
SURCHARGE	GOLDBECK	339808	20.00
SHERIFF HAWKINS	GOLDBECK	339808	12.00
CENTRE CO.	GOLDBECK	339809	75.00

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

So Answers,



Chester A. Hawkins  
Sheriff

# SHERIFF'S OFFICE

## CENTRE COUNTY

GOLDBECK, MCCAFFERTY &amp;

Rm 101 Court House, Bellefonte, Pennsylvania, 16823 (814) 355-6803

Tw

SHERIFF SERVICE PROCESS RECEIPT, AND AFFIDAVIT OF RETURN		INSTRUCTIONS FOR SERVICE OF PROCESS: You must file one instruction sheet for each defendant. please type or print legibly. Do Not detach any copies.	
1. Plaintiff(s) Deutsche Bank National Trust Company		2. Case Number 2008-983-CD	
3. Defendant(s) Ronald D and Vicki L Henry		4. Type of Writ or Complaint: Complaint 501562	
SERVE → AT	5. Name of Individual, Company, Corporation, Etc., to Serve or Description of Property to be Levied, Attached or Sold. Vicki L Henry		
	6. Address (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code) 200 Merryman Lane, Philipsburg, PA 16866		
7. Indicate unusual service: <input type="checkbox"/> Reg Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Deputize <input type="checkbox"/> Post <input type="checkbox"/> Other			
Now, _____ 20____, I SHERIFF OF CENTRE COUNTY, PA., do hereby deputize the Sheriff of _____ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff. _____ Sheriff of Centre County			
8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE			

NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.

9. Print/Type Name and Address of Attorney/Originator GOLDBECK, MCCAFFERTY & MCKEEVER SUITE 5000-MELLON INDEPENDENCE CENTER 701 MARKET ST. PHILADELPHIA, PA. 19106-1532	10. Telephone Number 215-627-1322	11. Date
12. Signature		

**SPACE BELOW FOR USE OF SHERIFF ONLY - DO NOT WRITE BELOW THIS LINE**

13. I acknowledge receipt of the writ or complaint as indicated above.	SIGNATURE of Authorized CCSD Deputy of Clerk and Title	14. Date Filed	15. Expiration/Hearing Date
<b>TO BE COMPLETED BY SHERIFF</b>			
16. Served and made known to <u>Ron Henry</u> , on the <u>12</u> day of <u>June</u> , 20 <u>2008</u> , at <u>3:00 PM</u> o'clock, <u>_____</u> m., at <u>200 Merryman Lane, Philipsburg, PA 16866</u> , County of Centre			
Commonwealth of Pennsylvania, in the manner described below: <input type="checkbox"/> Defendant(s) personally served. <input type="checkbox"/> Adult family member with whom said Defendant(s) resides(s). Relationship is <u>husband</u> <input type="checkbox"/> Adult in charge of Defendant's residence. <input type="checkbox"/> Manager/Clerk of place of lodging in which Defendant(s) resides(s). <input type="checkbox"/> Agent or person in charge of Defendant's office or usual place of business. <u>_____</u> and officer of said Defendant company. Other <u>_____</u>			
On the _____ day of _____, 20____, at _____ o'clock, _____ M. Defendant not found because: <input type="checkbox"/> Moved <input type="checkbox"/> Unknown <input type="checkbox"/> No Answer <input type="checkbox"/> Vacant <input type="checkbox"/> Other _____			
Remarks:			
Advance Costs 75.00	Docket 9.00	Service 15.00	Sur Charge 20.00
Affidavit 3.50	Mileage 27.50	Postage	Misc.
Total Costs 75.00		Costs Due or Refund 0.00	
17. AFFIRMED and subscribed to before me this <u>13</u> day of <u>June</u> , 20 <u>08</u> <u>Adrianne Peters</u> Notary Public COMMONWEALTH OF PENNSYLVANIA My Commission Expires <u>Peters, Notary</u>		So Answer. 18. Signature of Dep. Sheriff <u>_____</u> 19. Date <u>6/13/08</u> 21. Signature of Sheriff <u>_____</u> 22. Date <u>_____</u>	
24. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED AUTHORITY		25. Date Received	

# SHERIFF'S OFFICE

## CENTRE COUNTY

GOLDBECK, MCCAFFERTY &amp;

Rm 101 Court House, Bellefonte, Pennsylvania, 16823 (814) 355-6803

SHERIFF SERVICE PROCESS RECEIPT, AND AFFIDAVIT OF RETURN		INSTRUCTIONS FOR SERVICE OF PROCESS: You must file one instruction sheet for each defendant. please type or print legibly. Do Not detach any copies.	
1. Plaintiff(s) Deutsche Bank National Trust Company		2. Case Number 2008-983-CD	
3. Defendant(s) Ronald D and Vicki L Henry		4. Type of Writ or Complaint: Complaint 501562	
SERVE → AT		5. Name of Individual, Company, Corporation, Etc., to Serve or Description of Property to be Levied, Attached or Sold. Ronald D Henry Jr. 6. Address (Street or RFD, Apartment No., City, Boro, Twp., State and Zip Code) 200 Merryman Lane, Philipsburg, PA 16866	
7. Indicate unusual service: <input type="checkbox"/> Reg Mail <input type="checkbox"/> Certified Mail <input type="checkbox"/> Deputize <input type="checkbox"/> Post <input type="checkbox"/> Other			
Now, _____ 20____, I SHERIFF OF CENTRE COUNTY, PA., do hereby deputize the Sheriff of _____ County to execute this Writ and make return thereof according to law. This deputation being made at the request and risk of the plaintiff. _____ Sheriff of Centre County			
8. SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE			
<b>NOTE ONLY APPLICABLE ON WRIT OF EXECUTION: N.B. WAIVER OF WATCHMAN</b> - Any deputy sheriff levying upon or attaching any property under within writ may leave same without a watchman, in custody of whomever is found in possession, after notifying person of levy or attachment, without liability on the part of such deputy or the sheriff to any plaintiff herein for any loss, destruction or removal of any such property before sheriff's sale thereof.			
9. Print/Type Name and Address of Attorney/Originator GOLDBECK, MCCAFFERTY & MCKEEVER SUITE 5000-MELLON INDEPENDENCE CENTER 701 MARKET ST. PHILADELPHIA, PA. 19106-1532		10. Telephone Number 215-627-1322	11. Date
		12. Signature	
<b>SPACE BELOW FOR USE OF SHERIFF ONLY - DO NOT WRITE BELOW THIS LINE</b>			
13. I acknowledge receipt of the writ or complaint as indicated above.		SIGNATURE of Authorized CCSD Deputy of Clerk and Title	
		14. Date Filed	15. Expiration/Hearing Date
<b>TO BE COMPLETED BY SHERIFF</b>			
16. Served and made known to Ronald D Henry, on the 12 day of June, 20 2008, at 3:00 PM o'clock, m., at 200 Merryman Lane, Philipsburg, PA 16866, County of Centre Commonwealth of Pennsylvania, in the manner described below: <input type="checkbox"/> Defendant(s) personally served. <input type="checkbox"/> Adult family member with whom said Defendant(s) resides(s). Relationship is defendant <input type="checkbox"/> Adult in charge of Defendant's residence. <input type="checkbox"/> Manager/Clerk of place of lodging in which Defendant(s) resides(s). <input type="checkbox"/> Agent or person in charge of Defendant's office or usual place of business. _____ and officer of said Defendant company. Other _____			
On the _____ day of _____, 20____, at _____ o'clock, _____ M. Defendant not found because: <input type="checkbox"/> Moved <input type="checkbox"/> Unknown <input type="checkbox"/> No Answer <input type="checkbox"/> Vacant <input type="checkbox"/> Other _____			
Remarks:			
Advance Costs 75.00	Docket 9.00	Service 15.00	Sur Charge 20.00
Affidavit 3.50	Mileage 27.50	Postage	Misc.
Total Costs 75.00	Costs Due or Refund 0.00		
17. AFFIRMED and subscribed to before me this 13 day of June 20, 2008. Corinne H. Peters Notary Public My Commission Expires 12/31/2010		So Answer. 18. Signature of Dep. Sheriff 19. Date 6/13/08 21. Signature of Sheriff 22. Date	
24. I ACKNOWLEDGE RECEIPT OF THE SHERIFF'S RETURN SIGNATURE OF AUTHORIZED AUTHORITY AND TITLE.		25. Date Received	



CHESTER A. HAWKINS  
SHERIFF

# Sheriff's Office Clearfield County

COURTHOUSE  
1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641  
FAX (814) 765-5915  
ROBERT SNYDER  
CHIEF DEPUTY  
MARILYN HAMM  
DEPT. CLERK  
CYNTHIA AUGHENBAUGH  
OFFICE MANAGER  
KAREN BAUGHMAN  
CLERK TYPIST  
PETER F. SMITH  
SOLICITOR

## DEPUTATION

### IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 104234

DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee

vs.

RONALD D. HENRY JR. and VICKI L. HENRY

TERM & NO. 08-983-CD

COMPLAINT IN MORTGAGE FORECLOSURE

**SERVE BY: 07/01/08**  
**COURT DATE:**

### MAKE REFUND PAYABLE TO

**SERVE:** RONALD D. HENRY J.R

**ADDRESS:** 200 MERRYMAN LANE, PHILIPSBURG, PA 16866

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 03, 2008.

RESPECTFULLY,

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA





CHESTER A. HAWKINS  
SHERIFF

# Sheriff's Office Clearfield County

COURTHOUSE  
1 NORTH SECOND STREET, SUITE 116  
CLEARFIELD, PENNSYLVANIA 16830

OFFICE (814) 765-2641  
FAX (814) 765-5915  
ROBERT SNYDER  
CHIEF DEPUTY  
MARILYN HAMM  
DEPT. CLERK  
CYNTHIA AUGHENBAUGH  
OFFICE MANAGER  
KAREN BAUGHMAN  
CLERK TYPIST  
PETER F. SMITH  
SOLICITOR

## DEPUTATION

### IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

PAGE 104234

DEUTSCHE BANK NATIONAL TRUST COMPANY as Trustee

vs.

RONALD D. HENRY JR. and VICKI L. HENRY

TERM & NO. 08-983-CD

COMPLAINT IN MORTGAGE FORECLOSURE

**SERVE BY: 07/01/08**  
**COURT DATE:**

### MAKE REFUND PAYABLE TO

**SERVE:** VICKI L. HENRY

**ADDRESS:** 200 MERRYMAN LANE, PHILIPSBURG, PA 16866

Know all men by these presents, that I, CHESTER A. HAWKINS, HIGH SHERIFF OF CLEARFIELD COUNTY, State of Pennsylvania, do hereby deputize the SHERIFF OF COUNTY, Pennsylvania to execute this writ. This Deputation being made at the request and risk of the Plaintiff this day, June 03, 2008.

RESPECTFULLY,

CHESTER A. HAWKINS,  
SHERIFF OF CLEARFIELD COUNTY, PENNSYLVANIA

**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER

ATTORNEY I.D. #56129

SUITE 5000 - MELLON INDEPENDENCE CENTER

701 MARKET STREET

PHILADELPHIA, PA 19106

(866) 413-2311

WWW.GOLDBECKLAW.COM

ATTORNEY FOR PLAINTIFF

**ATTORNEY  
COPY**

I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED

**COPY**

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES  
INC., ASSET-BACKED PASS-THROUGH  
CERTIFICATES, SERIES 2003-1A1

10801 6th Street

Suite 130

Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR.

VICKI L. HENRY

**Mortgagors and Real Owners**

419 Decatur Street

Philipsburg, PA 16866

*Defendants*

IN THE COURT OF COMMON PLEAS

OF CLEARFIELD COUNTY

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term **2008-983-CD**  
No.

**CIVIL ACTION: MORTGAGE  
FORECLOSURE**

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after the Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claim in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

**KEYSTONE LEGAL SERVICES**

211 1/2 E. Locust Street

Clearfield, PA 16830

814-765-9646

I hereby certify this to be a true  
and attested copy of the original  
statement filed in this case.

**MAY 28 2008**

**June 2, 2008** Document  
Reinstated/Reissued to Sheriff/Attorney  
for service.

*[Signature]*  
Deputy Prothonotary

**PENNSYLVANIA BAR ASSOCIATION**

P.O. Box 186

Harrisburg, PA 17108

800-692-7375

Attest.

*[Signature]*  
Prothonotary/  
Clerk of Courts

AVISO

LE HAN DEMANDADO A USTED EN LA CORTE. SI DESEA DEFENDERSE CONTRA LAS QUEJAS PERESENTADAS, ES ABSOLUTAMENTE NECESSARIO QUE USTED RESPONDA DENTRO DE 20 DIAS DESPUES DE SER SERVIDO CON ESTA DEMANDA Y AVISO. PARA DEFENDERSE ES NECESSARIO QUE USTED, O SU ABOGADO, REGISTRE CON LA CORTE EN FORMA ESCRITA, EL

PUNTO DE VISTA DE USTED Y CUALQUIER OBJECCION CONTRA LAS QUEJAS EN ESTA DEMANDA.

RECUERDE: SI USTED NO REPONDE A ESTA DEMANDA, SE PUEDE PROSEGUIR CON EL PROCESO SIN SU PARTICIPACION. ENTONCES, LA COUTE PUEDE, SIN NOTIFICARIO, DECIDIR A FAVOR DEL DEMANDANTE Y REQUERIRA QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. POR RAZON DE ESA DECISION, ES POSSIBLE QUE USTED PUEDA PERDER DINERO, PROPIEDAD U OTROS DERECHOS IMPORTANTES.

USTED DEBE LLEVAR ÉSTE PAPEL A SU ABOGADO ENSEGUIDA. SI USTED NO TIENE UN ABOGADO, VAYA O LLAME POR TELÉFONO LA OFICINA FIJADA AQUÍ ABAJO. ESTA OFICINA PUEDE PROVEERÉ CON INFORMACIÓN DE CÔMO CONSEUIR UN ABOGADO.

SI USTED NO PUEDE PAGARLE A UN ABOGADO, ÉSTA OFICINA PUEDE PROVEERÉ INFORMACION ACERCA AGENCIAS QUE PUEDAN OFRECER SERVICIOS LEGAL A PERSONAS ELIGIBLE AQ UN HONORARIO REDUCIDO O GRATIS.

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**THIS FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT  
A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU  
WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

Resources available for Homeowners in Foreclosure

### **ACT NOW!**

Even though your lender (and our client) has filed an Action of Mortgage Foreclosure against you, you still may be able to SAVE YOUR HOME FROM FORECLOSURE.

- 1). Call an attorney. For referrals to a qualified attorney call either of the following numbers: 814-765-9646 or 800-692-7375.
- 2). Call the Consumer Credit Counseling Agency at 1-800-989-2227 for free counseling.
- 3). Visit HUD'S website [www.hud.gov](http://www.hud.gov) for Help for Homeowners Facing the Loss of Their Homes.
- 4). Pennsylvania Housing Finance Agency also offers other loan programs that may assist homeowners in default. Please See the PHFA website <http://www.phfa.org/consumers/homeowners/real.aspx>.
- 5). Call the Plaintiff (your lender) at 800-211-6926 and ask to speak to someone about Loss Mitigation or Home Retention options.
- 6). Call or contact our office to request the amount to bring the account current, or payoff the mortgage or request a Loan Workout/ Home Retention Package. Call our toll free number at 1-866-413-2311 or via email at [homeretention@goldbecklaw.com](mailto:homeretention@goldbecklaw.com). Call Seth at 215-825-6329 or fax 215-825-6429. The figure and/or package you requested will be mailed to the address that you request or faxed if you leave a message with that information. The attorney in charge of our firm's Homeowner Retention Department is David Fein who can be reached at 215-825-6318 or Fax: 215-825-6418. Please reference our Attorney File Number of 66779FC.

Para informacion en espanol puede comunicarse con Loretta al 215-825-6344.

**This Action of Mortgage Foreclosure will continue unless you take action to stop it.**

**COMPLAINT IN MORTGAGE FORECLOSURE**

**ATTORNEY  
COPY**

**I HEREBY CERTIFY THAT THIS IS  
A TRUE AND CORRECT COPY OF  
THE ORIGINAL FILED**

1. Plaintiff is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1, 10801 6th Street, Suite 130, Rancho Cucamonga, CA 91730.
2. The names and addresses of the Defendants are RONALD D. HENRY JR., 200 Merryman Lane, Philipsburg, PA 16866 and VICKI L. HENRY, 200 Merryman Lane, Philipsburg, PA 16866, who are the mortgagors and real owners of the mortgaged premises hereinafter described.
3. On June 23, 2003 mortgagors made, executed and delivered a mortgage upon the Property hereinafter described to AMERIQUEST MORTGAGE COMPANY, which mortgage is recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument #200312190. The mortgage has been assigned to: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 by assignment of Mortgage. The Mortgage and assignment(s) are matters of public record and are incorporated by this reference in accordance with Pennsylvania Rule of Civil Procedure 1019(g); which Rule relieves the Plaintiff from its obligation to attach documents to pleadings if those documents are matters of public record.
4. The Property subject to the Mortgage is more fully described in the legal description set forth as Exhibit "A" ("Property").
5. The mortgage is in default because the monthly payments of principal and interest are due and unpaid for December 01, 2007 and each month thereafter and by the terms of the Mortgage, upon default in such payments for a period of one month or more, the entire principal balance and all interest due and other charges are due and collectible.
6. The following amounts are due to Plaintiff on the Mortgage:

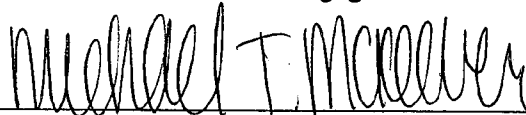
Principal Balance .....	\$106,423.93
Interest from 12/01/2007 through 05/31/2008 at 6.4000%.....	\$4,029.96
Per Diem interest rate at \$18.92	
Reasonable Attorney's Fee at 5% of Principal Balance	
as more fully explained in the next numbered paragraph .....	\$5,321.20
Late Charges from 12/01/2007 to 05/31/2008 .....	\$253.86
Monthly late charge amount at \$42.31	
Costs of suit and Title Search .....	\$900.00
Suspense.....	-\$247.93
Fees .....	\$30.50
Recoverable Balance.....	\$198.00
	<u>\$116,909.52</u>

7. If the Mortgage is reinstated prior to a Sheriff's Sale, the Attorney's Fees set forth above may be less than the amount demanded based on work actually performed. The Attorney's Fees requested are in conformity with the Mortgage and Pennsylvania law. Plaintiff is entitled to collect Attorney's fees of up to 5% of the remaining principal balance in the event the Property is sold to a third party purchaser at Sheriff's Sale or if the complexity of the action requires additional fees in excess of the amount demanded in the Action.

8. Plaintiff is not seeking a judgment of personal liability (or an "in personam" judgment) against the Defendants in this Action but reserves its right to bring a separate Action to establish that right, if such right exists. If Defendants have received a discharge of their personal liability in a Bankruptcy proceeding, this Action of Mortgage Foreclosure is, in no way, an attempt to re-establish the personal liability that was discharged in Bankruptcy, but only to foreclose the Mortgage and sell the Property pursuant to Pennsylvania law.
9. Notice of Intention to Foreclose and a Notice of Homeowners' Emergency Mortgage Assistance has been sent to Defendants by certified and regular mail, as required by Act 160 of 1998 of the Commonwealth of Pennsylvania, on the date(s) set forth in the true and correct copy of such notice(s) attached hereto as Exhibit "B". The Defendants have not had the required face-to-face meeting within the required time and Plaintiff has no knowledge of any such meeting being requested by the Defendants through the Plaintiff, the Pennsylvania Housing Finance Agency, or any appropriate Consumer Credit Counseling Agency.

WHEREFORE, Plaintiff demands a de teris judgment in mortgage foreclosure in the sum of \$116,909.52, together with interest at the rate of \$18.92, per day and other expenses, costs and charges incurred by the Plaintiff which are properly chargeable in accordance with the terms of the Mortgage and Pennsylvania law until the Mortgage is paid in full, and for the foreclosure of the Mortgage and Sheriff's Sale of the Property.

By:



**GOLDBECK McCAFFERTY & McKEEVER**

BY: MICHAEL T. McKEEVER, ESQUIRE

ATTORNEY FOR PLAINTIFF

**VERIFICATION**

I, Ralph Lopez, as the representative of the Plaintiff corporation within named do hereby verify that I am authorized to and do make this verification on behalf of the Plaintiff corporation and the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

Date: 5-19-08

  
\_\_\_\_\_  
Ralph Lopez  
CITI RESIDENTIAL LENDING, INC.

0048828768 RONALD D. HENRY JR. and VICKI L. HENRY

# *Exhibit A*

ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street; thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150') to Ida Street; thence by said Street North twenty-seven degrees fifteen minutes West, ninety feet (90'); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150') to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110') to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Four (4) in Foster's Addition to the Borough of Chester Hill.

UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

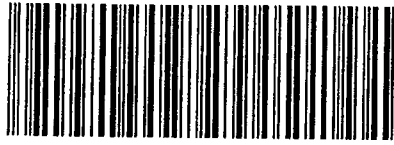
As described in Deed Book 1878, Page 360

Parcel #3-P12-335-43



# *Exhibit B*

P.O. Box 11000  
Santa Ana, CA 92711-1000



7182 6389 3060 1209 3312

Citi Residential Lending



March 28, 2008

RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

1 / NMC

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Servicer: Citi Residential Lending

**THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.**

**This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.**

**The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.**

**To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.**

**The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).**

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

**LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDIATAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO**

Citi Residential Lending  
P.O.Box 11000  
Santa Ana, CA 92711-1000



#BWNKZZS  
RONALD D HENRY JR  
VICKI L HENRY  
200 MERRYMAN LN  
PHILIPSBURG, PA 16866

March 28, 2008

169 / NMR

# ACT 91 NOTICE TAKE ACTION TO SAVE YOUR HOME FROM FORECLOSURE

AVISO: Este documento explica como los propietarios de casas pueden evitar perder sus hogares debido a demoras de pagos. Para información en español llame a su prestamista.

## STATEMENTS OF POLICY

Loan Number: 0048828768  
Property Address: 419 DECATUR STREET, PHILIPSBURG PA, 16866  
Original Lender: Citi Residential Lending  
Current Lender/Service: Citi Residential Lending

THIS FIRM IS A DEBT COLLECTOR ATTEMPTING TO COLLECT A DEBT. THIS NOTICE IS SENT TO YOU IN AN ATTEMPT TO COLLECT THE INDEBTEDNESS REFERRED TO HEREIN AND ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THAT PURPOSE. IF YOU HAVE PREVIOUSLY RECEIVED A DISCHARGE IN BANKRUPTCY, THIS CORRESPONDENCE IS NOT AND SHOULD NOT BE CONSTRUED TO BE AN ATTEMPT TO COLLECT A DEBT, BUT ONLY ENFORCEMENT OF A LIEN AGAINST PROPERTY.

This is an official notice that the mortgage on your home is in default, and the lender intends to foreclose. Specific information about the nature of the default is provided in the attached pages.

The HOMEOWNER'S MORTGAGE ASSISTANCE PROGRAM (HEMAP) may be able to help to save your home. This Notice explains how the program works.

To see if HEMAP can help, you must MEET WITH A CONSUMER CREDIT COUNSELING AGENCY WITHIN 30 DAYS OF THE DATE OF THIS NOTICE. Take this Notice with you when you meet with the Counseling Agency.

The name, address and phone number of Consumer Credit Counseling Agencies serving your County are listed at the end of this Notice. If you have any questions, you may call the Pennsylvania Housing Finance Agency toll free at 1-800-342-2397. (Persons with impaired hearing can call (717) 780-1869).

This Notice contains important legal information. If you have any questions, representatives at the Consumer Credit Counseling Agency may be able to help explain it. You may also want to contact an attorney in your area. The local bar association may be able to help you find a lawyer.

LA NOTIFICACION EN ADJUNTO ES DE SUMA IMPORTANCIA, PUES AFECTA SU DERECHO A CONTINUAR VIVIENDO EN SU CASA. SI NO COMPRENDE EL CONTENIDO DE ESTA NOTIFICACION OBTENGA UNA TRADUCCION INMEDITAMENTE LLAMANDO ESTA AGENCIA (PENNSYLVANIA HOUSING FINANCE AGENCY) SIN CARGOS AL NUMERO MENCIONADO ARRIBA. PUEDES SER ELEGIBLE PARA UN

PRESTAMO POR EL PROGRAMA LLAMADO "HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM" EL CUAL PUEDE SALVAR SU CASA DE LA PERDIDA DEL DERECHO A REDIMIR SU HIPOTECA.

HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE PROGRAM

YOU MAY BE ELIGIBLE FOR FINANCIAL ASSISTANCE  
WHICH CAN SAVE YOUR HOME FROM FORECLOSURE AND  
HELP YOU MAKE FUTURE MORTGAGE PAYMENTS

IF YOU COMPLY WITH THE PROVISIONS OF THE HOMEOWNER'S EMERGENCY MORTGAGE ASSISTANCE ACT OF 1983 (THE "ACT"), YOU MAY BE ELIGIBLE FOR EMERGENCY MORTGAGE ASSISTANCE:

- IF YOUR DEFAULT HAS BEEN CAUSED BY CIRCUMSTANCES BEYOND YOUR CONTROL,
- IF YOU HAVE A REASONABLE PROSPECT OF BEING ABLE TO PAY YOUR MORTGAGE PAYMENTS, AND
- IF YOU MEET OTHER ELIGIBILITY REQUIREMENTS ESTABLISHED BY THE PENNSYLVANIA HOUSING FINANCE AGENCY.

TEMPORARY STAY OF FORECLOSURE --Under the Act, you are entitled to a temporary stay of foreclosure on your mortgage for thirty (30) days from the date of this Notice. During that time you must arrange and attend a face-to-face meeting with one of the consumer credit counseling agencies listed at the end of this Notice. THIS MEETING MUST OCCUR WITHIN THE NEXT (30) DAYS. IF YOU DO NOT APPLY FOR EMERGENCY MORTGAGE ASSISTANCE, YOU MUST BRING YOUR MORTGAGE UP TO DATE. THE PART OF THIS NOTICE CALLED "HOW TO CURE YOUR MORTGAGE DEFAULT" EXPLAINS HOW TO BRING YOUR MORTGAGE UP TO DATE.

CONSUMER CREDIT COUNSELING AGENCIES --If you meet with one of the consumer credit counseling agency listed at the end of this notice, the lender may NOT take action against you for thirty (30) days after the date of this meeting. The names, addresses and telephone numbers of designated consumer credit counseling agencies for the county in which the property is located are set forth at the end of this Notice. It is only necessary to schedule one face- to-face meeting. Advise your lender immediately of your intentions.

APPLICATION FOR MORTGAGE ASSISTANCE --Your mortgage is in a default for the reasons set forth later in this Notice (see following pages for specific information about the nature of your default.) If you have tried and are unable to resolve this problem with the lender, you have the right to apply for financial assistance from the Homeowner's Emergency Mortgage Assistance Program. To do so, you must fill out, sign and file a completed Homeowner's Emergency Assistance Program Application with one of the designated consumer credit counseling agencies listed at the end of this Notice. Only consumer credit counseling agencies have applications for the program and they will assist you in submitting a complete application to the Pennsylvania Housing Finance Agency. Your application MUST be filed or postmarked within thirty (30) days of your face-to-face meeting.

**YOU MUST FILE YOUR APPLICATION PROMPTLY. IF YOU FAIL TO DO SO OR IF YOU DO NOT FOLLOW THE OTHER TIME PERIODS SET FORTH IN THIS LETTER, FORECLOSURE MAY PROCEED AGAINST YOUR HOME IMMEDIATELY AND YOUR APPLICATION FOR MORTGAGE ASSISTANCE WILL BE DENIED.**

AGENCY ACTION -- Available funds for emergency mortgage assistance are very limited. They will be disbursed by the Agency under the eligibility criteria established by the Act. The Pennsylvania Housing Finance Agency has sixty (60) days to make a decision after it receives your application. During that time, no foreclosure proceedings will be pursued against you if you have met the time requirements set forth above. You will be notified directly by the Pennsylvania Housing Finance Agency of its decision on your application.

March 28, 2008

Loan Number: 0048828768

**NOTE: IF YOU ARE CURRENTLY PROTECTED BY THE FILING OF A PETITION IN BANKRUPTCY, THE FOLLOWING PART OF THIS NOTICE IS FOR INFORMATION PURPOSES ONLY AND SHOULD NOT BE CONSIDERED AS AN ATTEMPT TO COLLECT THE DEBT.**

**(If you have filed bankruptcy you can still apply for Emergency Mortgage Assistance.)**

**HOW TO CURE YOUR MORTGAGE DEFAULT (Bring it up to date).**

**NATURE OF THE DEFAULT** -The MORTGAGE debt by the above lender on your property located at: 419 DECATUR STREET, PHILIPSBURG, PA 16866 IS SERIOUSLY IN DEFAULT because:

A. YOU HAVE NOT MADE MONTHLY MORTGAGE PAYMENTS for the following months and the following amounts are now past due:

12/01/07 thru 03/01/08

Minimum Payments plus late charge or other fees: \$3048.88

Minimum Amount to Cure Default: \$3048.88

B. YOU HAVE FAILED TO TAKE THE FOLLOWING ACTION (Do not use if not applicable): N/A

**HOW TO CURE THE DEFAULT** --You may cure the default within THIRTY (30) DAYS of the date of this notice BY PAYING THE TOTAL AMOUNT PAST DUE TO THE LENDER, WHICH IS \$3048.88 PLUS ANY MORTGAGE PAYMENTS AND LATE CHARGES WHICH BECOME DUE DURING THE THIRTY (30) DAY PERIOD. Payments must be made either by cash, cashier's check, certified check or money order made payable and sent to:

Citi Residential Lending  
P.O. Box 5926  
Carol Stream, IL 60197-5926

You can cure any other default by taking the following action within THIRTY (30) DAYS of the date of this letter: (Do not use if not applicable.) N/A

**IF YOU DO NOT CURE THE DEFAULT** --If you do not cure the default within THIRTY (30) DAYS of the date of this Notice, the lender intends to exercise its rights to accelerate the mortgage debt. This means that the entire outstanding balance of this debt will be considered due immediately and you may lose the chance to pay the mortgage in monthly installments. If full payment of the total amount past due is not made within THIRTY (30) DAYS, the lender also intends to instruct its attorneys to start legal action to foreclose upon your mortgaged property.

**IF THE MORTGAGE IS FORECLOSED UPON--** The mortgaged property will be sold by the Sheriff to pay off the mortgage debt. If the lender refers your case to its attorneys, but you cure the delinquency before the lender begins legal proceedings against you, you will still be required to pay the reasonable attorney's fees that were actually incurred, up to \$50.00. However, if legal proceedings are started against you, you will have to pay all reasonable attorney's fees actually incurred by the lender even if they exceed \$50.00. Any attorney's fees will be added to the amount you owe the lender, which may also include other reasonable costs. If you cure the default within the THIRTY (30) DAY period, you will not be required to pay attorney's fees.

**OTHER LENDER REMEDIES** -- The lender may also sue you personally for the unpaid principal balance and all other sums due under the mortgage.

**RIGHT TO CURE THE DEFAULT PRIOR TO SHERIFF'S SALE--** If you have not cured the default within the THIRTY (30) DAY period and foreclosure proceedings have begun, you still have the right to cure the default and prevent the sale at any time up to one hour before the Sheriff's Sale. You may do so by paying the minimum amount then past due, plus any late or other charges then due, reasonable attorney's fees and costs connected with the foreclosure sale and any other costs connected with the Sheriff's Sale as specified in writing by the lender and by performing any other requirements under the mortgage. Curing your default in the manner set forth in this notice will restore your mortgage to the same position as if you had never defaulted.

**EARLIEST POSSIBLE SHERIFF'S SALE DATE**-- It is estimated that the earliest date that such a Sheriff's Sale of the mortgaged property could be held would be approximately (6) MONTHS from the date of this Notice. A notice of the actual date of the Sheriff's Sale will be sent to you before the sale. Of course, the amount needed to cure the default will increase the longer you wait. You may find out at any time exactly what the required payment or action will be by contacting the lender.

**HOW TO CONTACT THE LENDER:**

Citi Residential Lending  
PO Box 11000  
Santa Ana, CA 92711-1000  
Phone Number 800-430-5262  
Fax Number 714-347-5037

**EFFECT OF SHERIFF'S SALE** -- You should realize that a Sheriff's Sale will end your ownership of the mortgaged property and your right to occupy it. If you continue to live in the property after the Sheriff's Sale, a lawsuit to remove you and your furnishings and other belongings could be started by the lender at any time.

**ASSUMPTION OF MORTGAGE** -- You      may or  X  may not (CHECK ONE) sell or transfer your home to a buyer or transferee who will assume the mortgage debt, provided that all the outstanding payments, charges and attorney's fees and costs are paid prior to or at the sale and that the other requirements of the mortgage are satisfied.

**YOU MAY ALSO HAVE THE RIGHT:**

- TO SELL THE PROPERTY TO OBTAIN MONEY TO PAY OFF THE MORTGAGE DEBT OR TO BORROW MONEY FROM ANOTHER LENDING INSTITUTION TO PAY OFF THIS DEBT.
- TO HAVE THIS DEFAULT CURED BY ANY THIRD PARTY ACTING ON YOUR BEHALF.
- TO HAVE THE MORTGAGE RESTORED TO THE SAME POSITION AS IF NO DEFAULT HAD OCCURRED, IF YOU CURE THE DEFAULT. (HOWEVER, YOU DO NOT HAVE THIS RIGHT TO CURE YOUR DEFAULT MORE THAN THREE TIMES IN ANY CALENDAR YEAR.)
- TO ASSERT THE NONEXISTENCE OF A DEFAULT IN ANY FORECLOSURE PROCEEDING OR ANY OTHER LAWSUIT INSTITUTED UNDER THE MORTGAGE DOCUMENTS.
- TO ASSERT ANY OTHER DEFENSE YOU BELIEVE YOU MAY HAVE TO SUCH ACTION BY THE LENDER.
- TO SEEK PROTECTION UNDER THE FEDERAL BANKRUPTCY LAW.

**CONSUMER CREDIT COUNSELING AGENCIES SERVING YOUR COUNTY ARE ATTACHED**

If you need additional assistance or counseling you may also find a Housing Counseling Agency in your area by calling Toll-free (800) 569-4287 or TDD (800) 877-8339.

Citi Residential Lending

Cc: Citi Residential Lending  
Attn: Collections Department

Loan Number: 0048828768  
Mailed by 1st Class Mail and by Certified Mail

## Homeowner s Emergency Assistance Program Centre County

---

---

---

**CCCS of Northeastern PA**

201 Basin Street  
Suite 6  
Williamsport, PA 17701  
570.323.6627  
800.922.9537

**CCCS of Northeastern PA**

---

202 W. Hamilton Avenue  
State College, PA 16801  
814.238.3668  
800.922.9537

**CCCS of Western PA**

Royal Remax Plaza  
917 A Logan Boulevard  
Altoona, PA 16602  
888.511.2227

**Lycom.Clntn Co Comm fo Comm Action**

2138 Lincoln Street  
P.O. Box 3568  
Williamsport, PA 17703  
570.326.0587

In the Court of Common Pleas of Clearfield County

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-  
IA1

10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

No. 2008-983-CD

**FILED** Any pd \$20.00  
m/13/18/08 Notice to Def.  
SEP 02 2008 Statement to Any  
(C10)

William A. Shaw  
Prothonotary/Clerk of Courts

**PRAECIPE FOR JUDGMENT**

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT  
OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE  
OF COLLECTING THE DEBT.**

Enter the Judgment in favor of Plaintiff and against RONALD D. HENRY JR. and VICKI L. HENRY by default  
for want of an Answer.

Assess damages as follows:

Debt

\$118,739.25

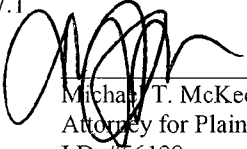
Interest from 08/30/2008 to Date of Sale

Total

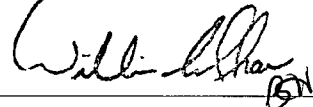
(Assessment of Damages attached)

**I CERTIFY THAT FOREGOING ASSESSMENT OF DAMAGES IS FOR SPECIFIED AMOUNTS ALLEGED TO  
BE DUE IN THE COMPLAINT AND IS CALCULABLE AS A SUM CERTAIN FROM THE COMPLAINT.**

I certify that written notice of the intention to file this praecipe was mailed or delivered to the party against whom judgment  
is to be entered and to his attorney of record, if any, after the default occurred and at least ten days prior to the date of the  
filing of this praecipe. A copy of the notice is attached. R.C.P. 237.1

  
Michael T. McKeever  
Attorney for Plaintiff  
I.D. #56129

AND NOW September 2, 2008, Judgment is entered in favor of  
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS  
OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES  
2003-IA1 and against RONALD D. HENRY JR. and VICKI L. HENRY by default for want of an Answer and damages  
assessed in the sum of \$118,739.25 as per the above certification.

  
Prothonotary



IN THE COURT OF COMMON PLEAS  
OF Clearfield COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS  
OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES  
2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

No. 2008-983-CD

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
**(Mortgagors and Record Owner(s))**  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT  
OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE  
PURPOSE OF COLLECTING THE DEBT.**

NOTICE

Notice is given that a judgment in the above-captioned matter has been entered against you.

William Shaw  
Prothonotary

By: \_\_\_\_\_

Deputy

If you have any questions concerning the above, please contact:

Michael T. McKeever  
**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **July 3, 2008**

TO:

**RONALD D. HENRY JR.**  
200 Merryman Lane  
Philipsburg, PA 16866

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2008-983-CD

TO:

**RONALD D. HENRY JR.**  
200 Merryman Lane  
Philipsburg, PA 16866

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

***Michael T. McKeever***

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever, Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **July 3, 2008**

TO:

**VICKI L. HENRY**  
200 Merryman Lane  
Philipsburg, PA 16866

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

**RONALD D. HENRY JR.**  
**VICKI L. HENRY**  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2008-983-CD

TO:

**VICKI L. HENRY**  
200 Merryman Lane  
Philipsburg, PA 16866

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**Michael T. McKeever**

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever, Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **July 3, 2008**

TO:

**RONALD D. HENRY JR.**  
419 Decatur Street  
Philipsburg, PA 16866

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

**RONALD D. HENRY JR.**  
**VICKI L. HENRY**  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2008-983-CD

TO:

**RONALD D. HENRY JR.**  
419 Decatur Street  
Philipsburg, PA 16866

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**Michael T. McKeever**

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever, Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

**THIS LAW FIRM IS A DEBT COLLECTOR AND WE ARE ATTEMPTING TO COLLECT A DEBT OWED TO OUR CLIENT. ANY INFORMATION OBTAINED FROM YOU WILL BE USED FOR THE PURPOSE OF COLLECTING THE DEBT.**

DATE OF THIS NOTICE: **July 3, 2008**

TO:

**VICKI L. HENRY**  
419 Decatur Street  
Philipsburg, PA 16866

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

*Plaintiff*

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

*Defendant(s)*

In the Court of  
Common Pleas  
of Clearfield County

CIVIL ACTION - LAW

Action of  
Mortgage Foreclosure

Term  
No. 2008-983-CD

TO:

**VICKI L. HENRY**  
419 Decatur Street  
Philipsburg, PA 16866

**IMPORTANT NOTICE**

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT A HEARING AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

KEYSTONE LEGAL SERVICES  
211 1/2 E. Locust Street  
Clearfield, PA 16830  
814-765-9646

PENNSYLVANIA BAR ASSOCIATION  
P.O. Box 186  
Harrisburg, PA 17108  
800-692-7375

**Michael T. McKeever**

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever, Esq.

Attorney for Plaintiff

Suite 5000 – 701 Market Street.

Philadelphia, PA 19106 215-825-6318

VERIFICATION OF NON-MILITARY SERVICE

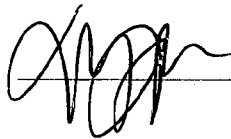
The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, RONALD D. HENRY JR., is about unknown years of age, that Defendant's last known residence is 200 Merryman Lane, Philipsburg, PA 16866, and is engaged in the unknown business located at unknown address.

2. That Defendant is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Action of Congress of 1940 and its Amendments.

Date:

8/29/02

A handwritten signature in black ink, appearing to be "R. D. Henry Jr.", written over a horizontal line.

VERIFICATION OF NON-MILITARY SERVICE

The undersigned, as the representative for the Plaintiff corporation within named do hereby verify that I am authorized to make this verification on behalf of the Plaintiff corporation and that the facts set forth in the foregoing verification of Non-Military Service are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to penalties of 18 Pa. C.S. 4904 relating to unsworn falsification to authorities.

1. That the above named Defendant, VICKI L. HENRY, is about unknown years of age, that Defendant's last known residence is 200 Merryman Lane, Philipsburg, PA 16866, and is engaged in the unknown business located at unknown address.

2. That Defendant is not in the Military or Naval Service of the United States or its Allies, or otherwise within the provisions of the Soldiers' and Sailors' Civil Relief Action of Congress of 1940 and its Amendments.

Date:

8/24/88

A handwritten signature in dark ink, appearing to be 'AMH', written over a horizontal line.

GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney I.D. #56129  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE  
SECURITIES INC., ASSET-BACKED PASS-  
THROUGH CERTIFICATES, SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
**(Mortgagor(s) and Record owner(s))**  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

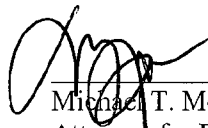
CIVIL ACTION LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2008-983-CD

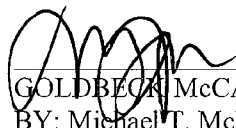
### ORDER FOR JUDGMENT

Please enter Judgment in favor of DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1, and against RONALD D. HENRY JR. and VICKI L. HENRY for failure to file an Answer in the above action within (20) days (or sixty (60) days if defendant is the United States of America) from the date of service of the Complaint, in the sum of \$118,739.25.



Michael T. McKeever  
Attorney for Plaintiff

I hereby certify that the above names are correct and that the precise residence address of the judgment creditor is DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 10801 6th Street Suite 130 Rancho Cucamonga, CA 91730 and that the name(s) and last known address(es) of the Defendant(s) is/are RONALD D. HENRY JR., 200 Merryman Lane Philipsburg, PA 16866 and VICKI L. HENRY, 200 Merryman Lane Philipsburg, PA 16866;



GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney for Plaintiff



ASSESSMENT OF DAMAGES

TO THE PROTHONOTARY:

Kindly assess the damages in this case to be as follows:

Principal Balance	\$106,423.93
Interest from 11/01/2007 through 08/29/2008	\$5,732.76
Reasonable Attorney's Fee	\$5,321.20
Late Charges	\$380.79
Costs of Suit and Title Search	\$900.00
Suspense	-\$247.93
Fees	\$30.50
Recoverable Balance	\$198.00
	<hr/>
	\$118,739.25



\_\_\_\_\_  
GOLDMECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney for Plaintiff

AND NOW, this 2<sup>nd</sup> day of September, 2008 damages are assessed as above.



\_\_\_\_\_  
Pro Prothy

COPY

NOTICE OF JUDGMENT

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA

CIVIL DIVISION

Deutsche Bank National Trust Company  
Ameritrust Mortgage Securities, Inc.

Vs.

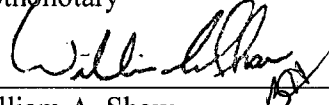
No. 2008-00983-CD

Ronald D. Henry Jr. Vicki L. Henry

To: DEFENDANT(S)

NOTICE is given that a JUDGMENT in the above captioned matter has been entered against you in the amount of \$118,739.25 on September 2, 2008.

William A. Shaw  
Prothonotary

  
William A. Shaw

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY,  
PENNSYLVANIA  
STATEMENT OF JUDGMENT

Deutsche Bank National Trust Company  
Ameriquest Mortgage Securities, Inc.  
Plaintiff(s)

No.: 2008-00983-CD

Real Debt: \$118,739.25

Atty's Comm: \$

Vs.

Costs: \$

Int. From: \$

Ronald D. Henry Jr.  
Vicki L. Henry  
Defendant(s)

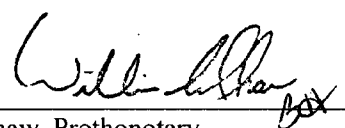
Entry: \$20.00

Instrument: Default Judgment

Date of Entry: September 2, 2008

Expires: September 2, 2013

Certified from the record this 2nd day of September, 2008.

  
\_\_\_\_\_  
William A. Shaw, Prothonotary

\*\*\*\*\*

SIGN BELOW FOR SATISFACTION

Received on \_\_\_\_\_, \_\_\_\_\_, of defendant full satisfaction of this Judgment,  
Debt, Interest and Costs and Prothonotary is authorized to enter Satisfaction on the same.

\_\_\_\_\_  
Plaintiff/Attorney

PRAECIPE FOR WRIT OF EXECUTION - (MORTGAGE FORECLOSURE)  
P.R.C.P 3180-3183

Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE  
SECURITIES INC., ASSET-BACKED PASS-  
THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
**Mortgagor(s) and Record Owner(s)**  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2008-983-CD

**PRAECIPE FOR WRIT OF EXECUTION**

TO THE PROTHONOTARY:

Issue Writ of Execution in the above matter:

Amount Due

\$118,739.25

Interest from

**08/30/2008** to Date of  
Sale at 6.4000%

(Costs to be added)

142.00 **Prothonotary costs**

**FILED** *Atty pd. 20.00*  
*m/13:28/01*  
**SEP 02 2008** *1ccolowits*  
William A. Shaw *w/prop desc to Sheriff*  
Prothonotary/Clerk of Courts



GOLDBECK McCAFFERTY & MCKEEVER  
BY Michael T. McKeever  
Attorney for Plaintiff

*(610)*

Term  
No. 2008-983-CD  
**IN THE COURT OF COMMON PLEAS**

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS  
OF AMERIQUEST MORTGAGE SECURITIES INC.,  
ASSET-BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-1A1

vs.

RONALD D. HENRY JR. and  
VICKI L. HENRY  
(Mortgagor(s) and Record Owner(s))  
419 Decatur Street  
Philipsburg, PA 16866

---

**PRAECIPE FOR WRIT OF EXECUTION**  
**(Mortgage Foreclosure)**

---

---

Michael T. McKeever  
Attorney for Plaintiff

---

**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322

ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street: thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150 feet) to Ida Street; thence by said Street North twenty seven degrees fifteen minutes West, ninety feet (90 feet); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150 feet) to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110 feet) to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Four (4) in Foster's Addition to the Borough of Chester Hill,

UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

TAX PARCEL #: 3-P12-335-43

PROPERTY ADDRESS: 419 DECATUR STREET, PHILIPSBURG, PA 16866

Goldbeck McCafferty & McKeever  
BY: Michael T. McKeever  
Attorney I.D. #56129  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-BACKED  
PASS-THROUGH CERTIFICATES, SERIES 2003-  
IA1

10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
**(Mortgagor(s) and Record Owner(s))**  
419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

No. 2008-983-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1, Plaintiff in the above action, by its attorney, Michael T. McKeever, Esquire, sets forth as of the date the  
praecipe for the writ of execution was filed the following information concerning the real property located at:

419 Decatur Street  
Philipsburg, PA 16866

1. Name and address of Owner(s) or Reputed Owner(s):

RONALD D. HENRY JR.  
200 Merryman Lane  
Philipsburg, PA 16866

VICKI L. HENRY  
200 Merryman Lane  
Philipsburg, PA 16866

2. Name and address of Defendant(s) in the judgment:

RONALD D. HENRY JR.  
200 Merryman Lane  
Philipsburg, PA 16866

VICKI L. HENRY  
200 Merryman Lane  
Philipsburg, PA 16866

3. Name and last known address of every judgment creditor whose judgment is a record lien on the property to be sold:

DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
P.O. Box 2675  
Harrisburg, PA 17105-2675

4. Name and address of the last recorded holder of every mortgage of record:

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.

7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
419 Decatur Street  
Philipsburg, PA 16866

(attach separate sheet if more space is needed)

I verify that the statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATED: August 29, 2008



GOLDBECK McCAFFERTY & McKEEVER

BY: Michael T. McKeever, Esq.

Attorney for Plaintiff



WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)  
P.R.C.P. 3180-3183 AND Rule 3257

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
419 Decatur Street  
Philipsburg, PA 16866

In the Court of Common Pleas of  
Clearfield County

No. 2008-983-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

To the Sheriff of Clearfield County, Pennsylvania

To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following described property:

PREMISES: 419 Decatur Street Philipsburg, PA 16866

See Exhibit "A" attached

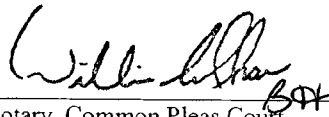
AMOUNT DUE \$118,739.25

Interest From **08/30/2008**  
Through Date of Sale

(Costs to be added)

Prothonotary costs 142.00

Dated: 9/2/08

  
Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy \_\_\_\_\_

Term  
No. 2008-983-CD

IN THE COURT OF COMMON PLEAS

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1

vs.

RONALD D. HENRY JR. and  
VICKI L. HENRY  
Mortagor(s)  
419 Decatur Street Philpsburg, PA 16866

WRIT OF EXECUTION  
(Mortgage Foreclosure)

REAL DEBT	\$	118,739.25
INTEREST from	\$	
COSTS PAID:	\$	
PROTHY	\$	142.00
SHERIFF	\$	
STATUTORY	\$	
COSTS DUE PROTHY	\$	
Office of Judicial Support	\$	
Judg. Fee	\$	
Cr.	\$	
Sat.	\$	

Michael T. McKeever  
Attorney for Plaintiff

**Goldbeck McCafferty & McKeever**  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 627-1322

ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street: thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150 feet) to Ida Street; thence by said Street North twenty seven degrees fifteen minutes West, ninety feet (90 feet); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150 feet) to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110 feet) to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Four (4) in Foster's Addition to the Borough of Chester Hill,

UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

TAX PARCEL #: 3-P12-335-43

PROPERTY ADDRESS: 419 DECATUR STREET, PHILIPSBURG, PA 16866

GOLDBECK McCAFFERTY & McKEEVER  
BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106-1532  
215-627-1322  
Attorney for Plaintiff

66779FC  
CF: 05/28/2008  
SD: 12/05/2008  
\$118,739.25

DEUTSCHE BANK NATIONAL TRUST COMPANY,  
AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE  
SECURITIES INC., ASSET-BACKED PASS-  
THROUGH CERTIFICATES, SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
Mortgagor(s) and  
Record Owner(s)

419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION – LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2008-983-CD

**FILED**

OCT 31 2008

W/12:40/w  
William A. Shaw  
Prothonotary/Clerk of Courts  
no 9/1 60

**CERTIFICATE OF SERVICE**  
**PURSUANT TO Pa.R.C.P. 3129.2 (c) (2)**

Michael T. McKeever, Esquire, Attorney for Plaintiff, hereby certifies that service on the Defendants of the Notice of Sheriff Sale was made by:

- ☒ Personal Service by the ~~Sheriff's Office~~/competent adult (copy of return attached).
- ☐ Certified mail by Michael T. McKeever (original green Postal return receipt attached).
- ☐ Certified mail by Sheriff's Office.
- ☐ Ordinary mail by Michael T. McKeever, Esquire to Attorney for Defendant(s) of record (proof of mailing attached).
- ☐ Acknowledgment of Sheriff's Sale by Attorney for Defendant(s) (proof of acknowledgment attached).
- ☐ Ordinary mail by Sheriff's Office to Attorney for Defendant(s) of record.

**IF SERVICE WAS ACCOMPLISHED BY COURT ORDER.**

- ☐ Premises was posted by Sheriff's Office/competent adult (copy of return attached).
- ☐ Certified Mail & ordinary mail by Sheriff's Office (copy of return attached).
- ☐ Certified Mail & ordinary mail by Michael T. McKeever (original receipt(s) for Certified Mail attached).
- ☐ Published in accordance with court order (copy of publication attached).

Pursuant to the Affidavit under Rule 3129 (copy attached), service on all lienholders (if any) has been made by ordinary mail by Michael T. McKeever, Esquire (copies of proofs of mailing attached).

The undersigned understands that the statements herein are subject to the penalties provided by 18 P.S. Section 4904.

Respectfully submitted,

Michael T. McKeever  
BY: Michael T. McKeever, Esquire  
Attorney for Plaintiff

Name and Address of Sender  
**GOLDBECK  
SUITE 5000  
701 MARKET STREET  
PHILADELPHIA, PA  
19106-1532**

Check type of mail or service:

- ☐ Certified  
☐ COD  
☐ Delivery Confirmation  
☐ Express Mail  
☐ Insured
- ☐ Recorded Delivery (International)  
☐ Registered  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation

Article Number

1.

DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

2.

PA DEPARTMENT OF PUBLIC WELFARE - Bureau  
of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
P.O. Box 2675  
Harrisburg, PA 17105-2675

3.

TENANTS/OCCUPANTS  
419 Decatur Street  
Philipsburg, PA 16866

4.

5.

6.

7.

8.

Total Number of Pieces  
Listed by Sender

Postmaster, Per (Name of receiving employee)

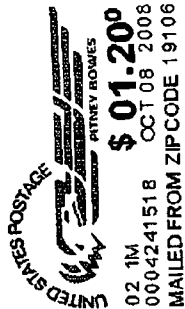
See Privacy Act Statement on Reverse

PS Form 3877, February 2002 (Page 1 of 2)

66779FC Clearfield County Sale Date: 12/05/2008

RONALD D. HENRY JR. & VICKI L. HENRY

Complete by Typewriter, Ink, or Ball Point Pen



COURT OF COMMON PLEAS, CLEARFIELD COUNTY PA  
**AFFIDAVIT OF SERVICE**

**DEUTSCHE BANK NATIONAL TRUST CO.**  
(PLAINTIFF)

VS.

**RONALD D. HENRY JR. et al.**  
(DEFENDANT)

**CASE and/or DOCKET:** 2008-983-CD

I, Ryan Mares, declare that I am a Pennsylvania State Constable and/or a Process Server, in and for the County of Berks, that I am not a party to this action, not an employee of a party to this action, or an attorney to the action, and that within the boundaries of the state where service was effected. I was authorized by law to perform the said service..

**SERVICE UPON:** **RONALD D. HENRY JR.**

**ADDRESS:** 200 MERRYMAN LN. PHILIPSBURG PA 16866

**ON:** 10/7/08 **AT:** 1020 Am

**Description:** approx. age 37 height 5'7" weight 195 race w sex F hair Blonde

**With documents:** NOTICE OF SHERIFFS SALE OF REAL PROPERTY

Manner of Service

By handing to:

☐ DEFENDANT WAS PERSONALLY SERVED.

☒ ADULT WITH WHOM THE SAID DEFENDANT RESIDES.

Name Vicki Henry Relationship Wife

☐ ADULT IN CHARGE OF DEFENDANTS RESIDENCE.

Name \_\_\_\_\_ Relationship \_\_\_\_\_

☐ POSTED PROPERTY

☐ AGENT OR PERSON IN CHARGE OF PLACE OF BUSINESS.

Name \_\_\_\_\_ Title \_\_\_\_\_

☐ MILITARY STATUS: NO / YES BRANCH \_\_\_\_\_

**COMMENTS:**

DEFENDANT WAS NOT SERVED BECAUSE:

   MOVED    UNKNOWN    NO ANSWER    VACANT    OTHER: \_\_\_\_\_

SERVICE WAS ATTEMPTED ON THE FOLLOWING DATES / TIMES:

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 7 DAY OF

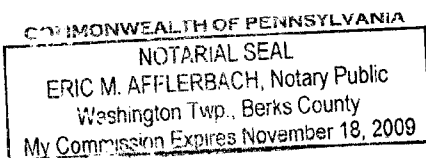
Oct, 2008

NOTARY

CONSTABLE / PROCESS SERVER

66779 FC

PROVEST, LLC P.O. BOX 1180, 93 EAST MAIN ST. BAYSHORE NY 11706 631.666.6168



COURT OF COMMON PLEAS, CLEARFIELD COUNTY PA  
AFFIDAVIT OF SERVICE

DEUTSCHE BANK NATIONAL TRUST CO.  
(PLAINTIFF)

VS.

RONALD D. HENRY JR. et al.  
(DEFENDANT)

CASE and/or DOCKET: 2008-983-CD

I, Ryan Marks, declare that I am a Pennsylvania State Constable and/or a Process Server, in and for the County of Berks, that I am not a party to this action, not an employee of a party to this action, or an attorney to the action, and that within the boundaries of the state where service was effected. I was authorized by law to perform the said service..

SERVICE UPON: VICKI L. HENRY

ADDRESS: 200 MERRYMAN LN. PHILIPSBURG PA 16866

ON: 10/7/08 AT: 1000 AM

Description: approx. age 37 height 5'7 weight 195 race W sex F hair Blonde

With documents: NOTICE OF SHERIFFS SALE OF REAL PROPERTY

Manner of Service

By handing to:

☒ DEFENDANT WAS PERSONALLY SERVED.

☐ ADULT WITH WHOM THE SAID DEFENDANT RESIDES.

Name \_\_\_\_\_ Relationship \_\_\_\_\_

☐ ADULT IN CHARGE OF DEFENDANTS RESIDENCE.

Name \_\_\_\_\_ Relationship \_\_\_\_\_

☐ POSTED PROPERTY

☐ AGENT OR PERSON IN CHARGE OF PLACE OF BUSINESS.

Name \_\_\_\_\_ Title \_\_\_\_\_

☐ MILITARY STATUS: NO / YES BRANCH \_\_\_\_\_

COMMENTS:

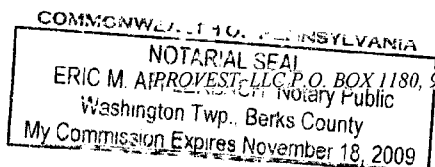
DEFENDANT WAS NOT SERVED BECAUSE:

   MOVED    UNKNOWN    NO ANSWER    VACANT    OTHER: \_\_\_\_\_

SERVICE WAS ATTEMPTED ON THE FOLLOWING DATES / TIMES:

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 7 DAY OF  
Oct, 2008

NOTARY



CONSTABLE / PROCESS SERVER

Ryan Marks  
66779 FC

**GOLDBECK McCAFFERTY & McKEEVER**

BY: Michael T. McKeever  
Attorney I.D.#56129  
Suite 5000 – Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
215-825-6320  
Attorney for Plaintiff

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

Plaintiff

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
**Mortgagor(s) and Record Owner(s)**

419 Decatur Street  
Philipsburg, PA 16866

Defendant(s)

IN THE COURT OF COMMON PLEAS

of Clearfield County

CIVIL ACTION - LAW

ACTION OF MORTGAGE FORECLOSURE

Term  
No. 2008-983-CD

**AFFIDAVIT PURSUANT TO RULE 3129**

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1, Plaintiff in the above action, by its attorney, Michael T. McKeever, Esquire, sets forth as of the date the  
praecipe for the writ of execution was filed the following information concerning the real property located at:

419 Decatur Street  
Philipsburg, PA 16866

1. Name and address of Owner(s) or Reputed Owner(s):

RONALD D. HENRY JR.  
200 Merryman Lane  
Philipsburg, PA 16866

VICKI L. HENRY  
200 Merryman Lane  
Philipsburg, PA 16866

2. Name and address of Defendant(s) in the judgment:



RONALD D. HENRY JR.  
200 Merryman Lane  
Philipsburg, PA 16866

VICKI L. HENRY  
200 Merryman Lane  
Philipsburg, PA 16866

3. Name and last known address of every judgment creditor whose judgment is a record lien on the property to be sold:

DOMESTIC RELATIONS OF CLEARFIELD COUNTY  
230 E. Market Street  
Clearfield, PA 16830

PA DEPARTMENT OF PUBLIC WELFARE - Bureau of Child Support Enforcement  
Health and Welfare Bldg. - Room 432  
P.O. Box 2675  
Harrisburg, PA 17105-2675

4. Name and address of the last recorded holder of every mortgage of record:

5. Name and address of every other person who has any record interest in or record lien on the property and whose interest may be affected by the sale:

6. Name and address of every other person of whom the plaintiff has knowledge who has any record interest in the property which may be affected by the sale.

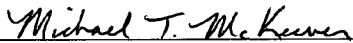
7. Name and address of every other person of whom the plaintiff has knowledge who has any interest in the property which may be affected by the sale.

TENANTS/OCCUPANTS  
419 Decatur Street  
Philipsburg, PA 16866

(attach separate sheet if more space is needed)

I verify that the statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.

DATED: October 28, 2008

  
GOLDBECK McCafferty & McKEEVER  
BY: Michael T. McKeever, Esq.  
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20838

NO: 08-983-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-IA1

vs.

DEFENDANT: RONALD D. HENRY, JR. AND VICKI L. HENRY

Execution REAL ESTATE

**SHERIFF RETURN**

DATE RECEIVED WRIT: 9/3/2008

LEVY TAKEN 9/25/2008 @ 9:43 AM

POSTED 9/25/2008 @ 9:43 AM

SALE HELD 12/5/2008

SOLD TO DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH  
CERTIFICATES, SERIES 2003-IA1

SOLD FOR AMOUNT \$1.00 PLUS COSTS

WRIT RETURNED 1/20/2009

DATE DEED FILED 1/20/2009

**SERVICES**

10/4/2008 @ SERVED RONALD D. HENRY, JR.

SERVED RONALD D. HENRY, JR., DEFENDANT, AT 200 MERRYMAN LANE, PHILIPSBURG, CENTRE COUNTY, PENNSYLVANIA BY REG AND  
CERT MAIL, CERT #70060810000145073947, SIGNED FOR BY RONALD HENRY

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

10/4/2008 @ SERVED VICKI L. HENRY

SERVED VICKI L. HENRY DEFENDANT, AT 200 MERRYMAN LANE, PHILIPSBURG, CENTRE COUNTY, PENNSYLVANIA BY REG AND CERT  
MAIL, CERT #70060810000145073930, SIGNED FOR BY RONALD HENRY.

A TRUE AND ATTESTED COPY OF THE ORIGINAL WRIT OF EXECUTION, NOTICE OF SALE AND COPY OF THE LEVY.

5  
**FILED**  
012:58 PM  
JAN 20 2009  
William A. Shaw  
Prothonotary/Clerk of Courts

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DOCKET # 20838

NO: 08-983-CD

PLAINTIFF: DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED  
HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-1A1

vs.

DEFENDANT: RONALD D. HENRY, JR. AND VICKI L. HENRY

Execution REAL ESTATE

SHERIFF RETURN

---

SHERIFF HAWKINS \$250.64


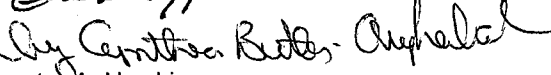
SURCHARGE \$40.00 PAID BY ATTORNEY

Sworn to Before Me This

\_\_\_\_\_ Day of \_\_\_\_\_ 2008

\_\_\_\_\_

So Answers,

Chester A. Hawkins  
Sheriff

WRIT OF EXECUTION – (MORTGAGE FORECLOSURE)  
P.R.C.P. 3180-3183 AND Rule 3257

DEUTSCHE BANK NATIONAL TRUST  
COMPANY, AS TRUSTEE, IN TRUST FOR THE  
REGISTERED HOLDERS OF AMERIQUEST  
MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES,  
SERIES 2003-1A1  
10801 6th Street  
Suite 130  
Rancho Cucamonga, CA 91730

vs.

RONALD D. HENRY JR.  
VICKI L. HENRY  
419 Decatur Street  
Philipsburg, PA 16866

In the Court of Common Pleas of  
Clearfield County

No. 2008-983-CD

WRIT OF EXECUTION  
(MORTGAGE FORECLOSURE)

Commonwealth of Pennsylvania:

County of Clearfield

To the Sheriff of Clearfield County, Pennsylvania

To satisfy the judgment, interest and costs in the above matter you are directed to levy upon and sell the following described property:

PREMISES: 419 Decatur Street Philipsburg, PA 16866

See Exhibit "A" attached

AMOUNT DUE

\$118,739.25

Interest From 08/30/2008  
Through Date of Sale

(Costs to be added)

Prothonotary costs 142.00

Dated: 9/2/08

William L. H. [Signature]  
Prothonotary, Common Pleas Court  
of Clearfield County, Pennsylvania

Deputy \_\_\_\_\_

Received this writ this 3rd day  
of September A.D. 2008  
At 3:00 A.M. (P.M.)

Charles A. Hankins  
Sheriff by Cynthia Butler-Chapman

Term  
No. 2008-983-CD

IN THE COURT OF COMMON PLEAS

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS  
TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF  
AMERIQUEST MORTGAGE SECURITIES INC., ASSET-  
BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-1A1

vs.

RONALD D. HENRY JR. and  
VICKI L. HENRY  
Mortgagor(s)  
419 Decatur Street Philadelphia, PA 19106

WRIT OF EXECUTION  
(Mortgage Foreclosure)

REAL DEBT	\$118,739.25
INTEREST from	\$
COSTS PAID:	\$
PROTHY	\$ 142.00
SHERIFF	\$
STATUTORY	\$
COSTS DUE PROTHY	\$
Office of Judicial Support	\$
Judg. Fee	
Cr.	
Sat.	

Michael T. McKeever  
Attorney for Plaintiff

Goldbeck McCafferty & McKeever  
Suite 5000 - Mellon Independence Center  
701 Market Street  
Philadelphia, PA 19106  
(215) 627-1322

ALL THAT CERTAIN lot of ground situate in the Borough of Chester Hill, County of Clearfield and State of Pennsylvania, bounded and described as follows:

BEGINNING on the West side of Decatur Street: thence by land of Andrew Gearhart, South thirty-five degrees and forty minutes West, one hundred and fifty feet (150 feet) to Ida Street; thence by said Street North twenty seven degrees fifteen minutes West, ninety feet (90 feet); thence by Lot No. 6, North twenty-seven degrees forty-five minutes East, one hundred fifty feet (150 feet) to Decatur Street; thence by said Street South sixty-two degrees and fifteen minutes East, one hundred ten feet (110 feet) to the place of BEGINNING.

BEING KNOWN AS Lots Nos. Two (2) and Four (4) in Foster's Addition to the Borough of Chester Hill,

UNDER AND SUBJECT, NEVERTHELESS, to all exceptions, reservations, conditions and restrictions as contained in prior Deeds in the chain of title.

TAX PARCEL #: 3-P12-335-43

PROPERTY ADDRESS: 419 DECATUR STREET, PHILIPSBURG, PA 16866

**REAL ESTATE SALE  
SCHEDULE OF DISTRIBUTION**

NAME RONALD D. HENRY, JR.

NO. 08-983-CD

NOW, January 20, 2009, by virtue of the Writ of Execution hereunto attached, after having given due and legal notice of time and place of sale by publication in a newspaper published in this County and by handbills posted on the premises setting for the date, time and place of sale at the Court House in Clearfield on December 05, 2008, I exposed the within described real estate of Ronald D. Henry, Jr. And Vicki L. Henry to public venue or outcry at which time and place I sold the same to DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF AMERIQUEST MORTGAGE SECURITIES INC., ASSET-BACKED PASS-THROUGH CERTIFICATES, SERIES 2003-IA1 he/she being the highest bidder, for the sum of \$1.00 plus costs and made the following appropriations, viz:

**SHERIFF COSTS:**

RDR	15.00
SERVICE	15.00
MILEAGE	18.72
LEVY	15.00
MILEAGE	18.72
POSTING	15.00
CSDS	10.00
COMMISSION	0.00
POSTAGE	17.20
HANDBILLS	15.00
DISTRIBUTION	25.00
ADVERTISING	15.00
ADD'L SERVICE	15.00
DEED	30.00
ADD'L POSTING	
ADD'L MILEAGE	
ADD'L LEVY	
BID AMOUNT	1.00
RETURNS/DEPUTIZE	
COPIES	15.00
	5.00
BILLING/PHONE/FAX	5.00
CONTINUED SALES	
MISCELLANEOUS	

**TOTAL SHERIFF COSTS                    \$250.64**

**DEED COSTS:**

ACKNOWLEDGEMENT	5.00
REGISTER & RECORDER	29.00
TRANSFER TAX 2%	0.00
<b>TOTAL DEED COSTS</b>	<b>\$29.00</b>

**PLAINTIFF COSTS, DEBT AND INTEREST:**

DEBT-AMOUNT DUE	118,739.25
INTEREST @ %	0.00
FROM TO 12/05/2008	

PROTH SATISFACTION	
LATE CHARGES AND FEES	
COST OF SUIT-TO BE ADDED	
FORECLOSURE FEES	
ATTORNEY COMMISSION	
REFUND OF ADVANCE	
REFUND OF SURCHARGE	40.00
SATISFACTION FEE	
ESCROW DEFICIENCY	
PROPERTY INSPECTIONS	
INTEREST	
MISCELLANEOUS	

**TOTAL DEBT AND INTEREST                    \$118,779.25**

**COSTS:**

ADVERTISING	380.56
TAXES - COLLECTOR	
TAXES - TAX CLAIM	
DUE	
LIEN SEARCH	100.00
ACKNOWLEDGEMENT	5.00
DEED COSTS	29.00
SHERIFF COSTS	250.64
LEGAL JOURNAL COSTS	126.00
PROTHONOTARY	142.00
MORTGAGE SEARCH	40.00
MUNICIPAL LIEN	

**TOTAL COSTS                                        \$1,073.20**

DISTRIBUTION WILL BE MADE IN ACCORDANCE WITH THE ABOVE SCHEDULE UNLESS EXCEPTIONS ARE FILED WITH THIS OFFICE **WITHIN TEN (10) DAYS FROM THIS DATE.**

CHESTER A. HAWKINS, Sheriff

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>A. Signature </p> </div> <div style="width: 50%;"> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> </div> </div>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">             RONALD D. HENRY, JR.              200 MERRYMAN LANE              PHILIPSBURG, PA 16866           </div>		<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>B. Received by (Printed Name) </p> </div> <div style="width: 50%;"> <p>C. Date of Delivery 10-4-08</p> </div> </div>	
<p>2. Article Number (Transfer from service label)</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail</p> </div> <div style="width: 50%;"> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.</p> </div> </div>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

7006 0810 0001 4507 3930

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com  
**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	5.49

Sent To

VICKI L. HENRY  
 200 MERRYMAN LANE  
 PHILIPSBURG, PA 16866

PS Form 3800, June 2002

See Reverse for Instructions

7006 0810 0001 4507 3947

**U.S. Postal Service™**  
**CERTIFIED MAIL™ RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com  
**OFFICIAL USE**

Postage	\$	
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	5.49

Sent To

RONALD D. HENRY, JR.  
 200 MERRYMAN LANE  
 PHILIPSBURG, PA 16866

PS Form 3800, June 2002

See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> <li>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>■ Print your name and address on the reverse so that we can return the card to you.</li> <li>■ Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>		<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>A. Signature </p> </div> <div style="width: 50%;"> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> </div> </div>	
<p>1. Article Addressed to:</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;">             VICKI L. HENRY              200 MERRYMAN LANE              PHILIPSBURG, PA 16866           </div>		<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p>B. Received by (Printed Name) </p> </div> <div style="width: 50%;"> <p>C. Date of Delivery 10-4-08</p> </div> </div>	
<p>2. Article Number (Transfer from service label)</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>	
<p>3. Service Type</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Registered <input type="checkbox"/> Insured Mail</p> </div> <div style="width: 50%;"> <p><input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> C.O.D.</p> </div> </div>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540